

1 UNITED STATES DISTRICT COURT
2 NORTHERN DIVISION OF GEORGIA
3 GAINESVILLE DIVISION

4 CINDY COSPER,)
5)
6 Plaintiff,)
7) Civil Action No.
8 vs.)
9) 2:18-cv-00189-CWS
10 FORD MOTOR COMPANY,)
11)
12 Defendant.)

11 DEPOSITION OF
12 TROOPER JOEY WILSON
13 Tuesday, October 29, 2019
14 10:10 a.m.
15 Peachtree Club
16 999 Peachtree Street, N.E.
17 Suite 28
18 Atlanta, Georgia

19
20 Robin K. Ferrill, CCR-B-1936, RPR
21
22
23
24

25 Job No. CS3577058

APPEARANCES OF COUNSEL

On behalf of the Plaintiff

JONATHAN A. PARRISH, Esquire

The Parrish Law Firm, LLC

Resurgens Plaza, Suite 2250

945 East Paces Ferry Road, N.E.

Atlanta, Georgia 30326-2900

404.891.0141

jparrish@parrishfirm.com

On behalf of the Defendant

MICHAEL R. BOORMAN, Esquire

DWAYNE ALLYN BROWN, Esquire

KARISSA BLACKBURN, Paralegal

Huff Powell Bailey LLC

999 Peachtree Street, N.E., Suite 950

Atlanta, Georgia 30309-4514

404.892.4022

mboorman@huffpowellbailey.com

dbrown@huffpowellbailey.com

On behalf of the Defendant

DAMON SINGLETON, Esquire (via phone)

Turner and Associates, P.A.

4705 Somers Avenue

Suite 100

North Little Rock, Arkansas 72116

damon@tturner.com

INDEX

DEPOSITION OF

TROOPER JOEY WILSON

Tuesday, October 29, 2019

EXAMINATION BY	PAGE
Mr. Boorman	4, 96
By Mr. Parrish	79

DESCRIPTION OF EXHIBITS

DEFENDANT'S EXHIBIT	IDENTIFICATION	PAGE
Exhibit 1	Subpoena to Testify	6
Exhibit 2	Georgia Motor Vehicle Crash Report	7
Exhibit 3	Georgia Motor Vehicle Crash Report	7
	Overlay, Cindy Cosper	
Exhibit 4	Georgia Motor Vehicle Crash Report	7
	Overlay, Ronnie Ammerson	
Exhibit 5	Georgia Uniform Traffic Citations,	10
	Summons and Accusation	
Exhibit 6	Color copies of photographs	12
Exhibit 7	*Copy of in-car video	15
Exhibit 8	State of Georgia Traffic Crash	15
	Report	
Exhibit 9	Ga. Code Ann., 40-8-74, Effective	78
	July 1, 2011	

(Original exhibits attached to the Original transcript.)

1 DEPOSITION OF

2 TROOPER JOEY WILSON

3 Tuesday, October 29, 2019

4 MR. BOORMAN: Ready to go on the record.

5 This will be the deposition of Trooper Wilson
6 taken by agreement of counsel and pursuant to
7 the Federal rules. And if you could please
8 swear the witness.

9 TROOPER JOEY WILSON,

10 called as a witness, having been duly sworn
11 by a Notary Public, was examined and testified as
12 follows:

13 MR. PARRISH: We reserve any objections
14 except those going to the form of the question,
15 responsiveness of the answer until the
16 deposition is first used.

17 MR. BOORMAN: That is fine with me. I
18 think that's what the Rules say as well.

19 MR. PARRISH: Okay. I just wanted to
20 confirm.

21 MR. BOORMAN: Sure.

22 EXAMINATION

23 BY MR. BOORMAN:

24 Q. Trooper Wilson, if you can state your full
25 name for the record.

1 A. Joseph Edwin Wilson.

2 Q. Okay. And have you given a deposition
3 before?

4 A. Previously of this case?

5 Q. No, sir. Just --

6 A. Yes.

7 Q. Just in general.

8 A. Yes.

9 Q. How many depositions have you given?

10 A. Maybe two.

11 Q. Okay. So the things that I want you to
12 remember are if you need a break at any point for any
13 reason, you need to get a call, you need to get a
14 drink of water, anything, just let me know and we're
15 happy to take a break. Okay?

16 The other thing that I ask is if any of my
17 questions are confusing or you don't understand them,
18 just let me know and I'm always happy to rephrase.
19 And I'm pretty sure that's true for Mr. Parrish as
20 well. Okay?

21 A. Okay.

22 Q. All right. Then as we get going in
23 conversation, sometimes people get used to nodding
24 their head or shaking their head. I don't mean to be
25 rude but I'll just ask if you could say, you know, an

1 audible answer. But as you see, we've got a very
2 talented court reporter taking down every word that
3 we say but she can't really take down what nods and
4 shakes are.

5 Is that okay?

6 A. It is.

7 Q. All right. Thank you.

8 Then I'll tell you the way I like to just
9 kind of methodically go through this. I want to talk
10 to you about file materials that you either have or
11 know exist. Then we'll talk about your background
12 for a little bit. Then we'll talk about what you
13 know about this crash and your investigation.

14 Okay?

15 A. Okay.

16 (Defendant's Exhibit 1, Subpoena to
17 Testify, marked for identification.)

18 Q. (By Mr. Boorman) So first I've marked as
19 Exhibit 1 just the Notice of Deposition. And in that
20 we ask for anything, any file materials related to
21 this case. As you probably can imagine, we've
22 already all sent requests for documents.

23 Do you have anything additional other than
24 what we would have gotten from the Georgia State
25 Patrol?

1 A. No.

2 Q. Okay.

3 (Defendant's Exhibit 2, Georgia Motor
4 Vehicle Crash Report, marked for
5 identification.)

6 Q. (By Mr. Boorman) Then the next thing I'm
7 going to hand you is Exhibit 2, which I'll represent
8 to you is a copy of the Georgia Motor Vehicle Crash
9 Report. And if you need to reference that at any
10 point, sir, feel free. Obviously I know you've done
11 probably a lot of these crashes and you've probably
12 done a lot since so hopefully this will help.

13 Related to that, we have looked at your
14 report and looked at the codes and done our best to
15 highlight a code sheet.

16 (Defendant's Exhibit 3, Georgia Motor
17 Vehicle Crash Report Overlay, Cindy Cosper,
18 marked for identification.)

19 Q. (By Mr. Boorman) So as Exhibit 3 I'm going
20 to hand you a highlighted code sheet that we believe
21 is for the codes listed for the vehicle and
22 specifically for Ms. Cosper or Ms. Pollard at the
23 time.

24 (Defendant's Exhibit 4, Georgia Motor
25 Vehicle Crash Report Overlay, Ronnie Ammerson,

1 marked for identification.)

2 Q. (By Mr. Boorman) And we've done the same
3 thing for Mr. Ammerson and that's Exhibit 4. Not to
4 overwhelm you with paper but I think this will
5 hopefully be helpful as we kind of move along.

6 And take your time looking at those code
7 sheets and just let me know when you're ready.

8 A. There's no 52. What's 52?

9 Q. It's funny that you seized on that because
10 that was going to be one of my questions to you.
11 We've searched various versions of code sheets and
12 the only explanation that I can come up with is it
13 might have been a typo.

14 A. Well, no. Well, like I said, when we did
15 this report we didn't have this. Like, I don't know
16 if -- when they did the update, it updated all of the
17 previous crash reports because it was a drop-down box
18 on our -- on the time of the accident.

19 Q. Okay. This is really, really helpful. So
20 just kind of walk me through when you -- at the time
21 you filled out the report that is Exhibit 2.

22 A. This was not the report.

23 Q. What was the report? Was it online?

24 A. Yes, it was online report, just like this
25 one is now. This was, like, the original report when

1 I first came out of trooper school in 2006.

2 Q. Okay.

3 A. Same codes. It's -- and then they did an
4 update in 2009 or '10.

5 Q. Okay.

6 A. And then they just went back to this, like,
7 2017, 2018. So the other report, all this was the
8 same: The name, date of birth, all this. But all
9 these codes was you click on it and it was drop-down
10 box instead of using codes.

11 Q. Okay.

12 A. So I don't know what 52 -- I don't know how
13 52 got on there.

14 Q. Well, I'm glad we're not alone.

15 A. Okay.

16 Q. Because we didn't know how it got on there
17 either.

18 I'll tell you what --

19 A. And "changed lanes improperly," that
20 wouldn't have been what I put on there either.
21 Because I have worked a wreck since, you know,
22 recently and where they failed to maintain their
23 lane. And it was not "changed lanes improperly." I
24 think they had us put 36 and we would explain in the
25 Narrative that it was, like, failure to maintain

1 lane.

2 Q. Okay.

3 A. Because there's not a failure to maintain
4 lane in this code section now.

5 Q. I got you. Thank you so much for
6 explaining that.

7 All I can tell you is what is Exhibit 2 is
8 what we got from the Georgia State Patrol. But it
9 sounds like they tried to do some sort of upgrade and
10 maybe it didn't come through.

11 A. Uh-huh.

12 Q. There is -- we actually have another
13 version of this report that we can get from a third
14 party. And so we're going to print that out. I'm
15 going to have you take a look at that maybe instead.
16 And --

17 A. Okay.

18 Q. And so I'll tell you what. For right now
19 let's just push that stuff to the side.

20 A. Okay.

21 Q. And we can move on to something else as I'm
22 getting that printed out.

23 But I would like to show you the next thing
24 and hopefully you recognize this.

25 (Defendant's Exhibit 5, Georgia Uniform

1 Traffic Citations, Summons and Accusation,
2 marked for identification.)

3 Q. (By Mr. Boorman) Exhibit 5 is a Georgia
4 Uniform Traffic Citation. And if you can tell me,
5 sir, do you recognize your signature on this
6 anywhere?

7 A. Yes, sir.

8 Q. All right. Just tell us the date that you
9 filled this out and what this is.

10 A. This is just a traffic citation. The wreck
11 occurred on December 25th. So I wrote the ticket on
12 December 25th. The -- Cindy Pollard was present
13 during the time that I wrote the citation and she did
14 sign it.

15 How -- how I work traffic accidents, if
16 there's any property damage or injuries to anybody
17 other than the driver, I usually write a citation in
18 the accident. So she did fail to maintain her lane
19 and had an accident. So I did write her a citation
20 for failure to maintain lane.

21 Q. Okay.

22 A. And two numbers on here is just her number
23 and alternate number, just in case if I needed to get
24 in touch with her with any -- any more details about
25 the wreck or anything.

1 Q. Yes, sir. Okay. Thank you.

2 You can put that to the side.

3 (Defendant's Exhibit 6, Color copies of
4 photographs, marked for identification.)

5 Q. (By Mr. Boorman) And then the next thing
6 I'll give you that, again, I hope is familiar to you
7 is Exhibit 6. And you'll see on Exhibit 6 in the
8 bottom right-hand corner there are -- there's a name
9 Ammerson as well as numbers at the bottom. Those are
10 just markings for this case. I know you didn't put
11 those on there.

12 A. No.

13 Q. But after you had a chance to look through
14 those photos, do these photos accurately depict the
15 scene and the vehicles shortly after the crash?

16 A. Yes, sir.

17 Q. Okay. And are you aware of any other
18 photos related to this crash?

19 A. No, sir.

20 Q. Did you take those photos that we just
21 marked as Exhibit 6?

22 A. Yes, sir.

23 Q. On what camera? And do you still have
24 copies of them?

25 A. I don't know what camera I -- I took it on.

1 I don't know if it was -- I used a Post camera. I
2 don't know if I had to use a phone. But I do not
3 have any copies of it no more and I was -- told him
4 previously that I usually take pictures if there are
5 serious injuries.

6 After 30 days our -- our policy is if they
7 die -- if anybody becomes deceased after 30 days, we
8 don't consider it as a fatality report. So after
9 30 days, I'll know if -- if -- if -- when I left
10 there I don't know if it's on that camera but I don't
11 have the pictures.

12 Q. Okay.

13 A. No more.

14 Q. What was your process for when you take
15 photos at this period of time? You take them and
16 then would you turn them into the Georgia State
17 Patrol or what would you do with them?

18 A. If -- if it was, like, really serious
19 injuries where it would be prosecutable injuries then
20 I would turn them in. If -- if it comes up -- I
21 mean, I'm not meaning in the vicinity of kind of way
22 that you can cut your finger in Haralson County and
23 they will Life Flight you. So, like, sometimes you
24 don't know how serious the actual crash is.

25 Q. Got you.

1 A. So I kept them for a little bit. And like
2 I said, I don't know if I turned -- I don't know if I
3 took it with a -- an actual -- because the State did
4 provide a camera. But I don't know if I took it
5 with -- with that camera or if I used a phone. I
6 can't remember.

7 Q. Okay. The reason why I'm asking you so
8 many questions is you did a really good job of
9 photographing, marking and photographing the scene.
10 And we would love the best quality pictures, you
11 know, the digital files called jpeg files.

12 Do you have any idea where we could try to
13 find those?

14 A. You could try calling the Paulding Post. I
15 turned that camera in. I don't know if it's on it or
16 not. When I left Paulding I turned everything in
17 because that was Paulding's stuff. But like I said,
18 I left Paulding in 20 -- December of 2016.

19 Q. Okay.

20 A. So I don't know if they reissued it, if
21 they deleted the photos. I don't know.

22 Q. I got you. Okay.

23 Then on the day of this crash, do you
24 recall having in-car video?

25 A. Yes, sir.

1 Q. All right. Then I'll tell you what I'm
2 going to do. I'm going to mark as Exhibit 7 a copy
3 of the in-car video.

4 (Defendant's Exhibit 7, *Copy of in-car
5 video, marked for identification.)

6 Q. (By Mr. Boorman) And for the purpose of the
7 transcript, we can decide whether I just want to
8 attach the actual file on a thumb drive or a screen
9 shot of it but we all have the same video.

10 But I'm just going to show you -- so I'm
11 going to show you just at the minute and 25-second
12 mark and we'll talk about this more in a second. But
13 I just want to see if this -- do you recall this
14 scene as you pulled up to it?

15 A. Yes, sir.

16 Q. Okay. And I'm going to ask you more
17 specific questions kind of as we move along. But I
18 just want to make sure this video, in-car video, is a
19 fair and accurate depiction of the scene of the crash
20 shortly after the crash occurred.

21 A. Yes, sir.

22 Q. Okay.

23 (Defendant's Exhibit 8, State of Georgia
24 Traffic Crash Report, marked for
25 identification.)

1 Q. (By Mr. Boorman) All right. And let me
2 see. I'm marking as Exhibit 8 -- you'll notice that
3 I will take help from anyplace I can get.

4 That's Exhibit 8. And so here's another
5 copy of the Crash Report. And I'll tell you I think
6 we were able to purchase this from BuyCrash.

7 If you can look on the second page of this,
8 is that your signature, sir?

9 A. Yes, sir.

10 Q. Okay. Just because we're obviously dealing
11 with couple different copies of the Crash Report,
12 could you just take a minute to look at this and tell
13 us if this looks like what you filled out at the time
14 of the crash?

15 A. Yeah. This is the actual Crash Report that
16 we used at the time of the crash. And it's easier to
17 read because there's no codes.

18 Q. We were trying to just use the official one
19 but apparently the official one is not the best one
20 in this case.

21 A. Huh-uh.

22 Q. So we'll use this one, then. Okay. Great.
23 I'm glad we looked at that.

24 You just let me know when you're done
25 looking at it.

1 A. Oh, yeah, I'm done.

2 Q. Okay. I'm just doing a little
3 housekeeping, so --

4 A. Okay.

5 Q. I'm going to keep the stuff that we don't
6 need out of your way, the stuff that we've already
7 handled and then this stuff we will need.

8 A. Okay.

9 Q. Now that you've had just a moment to look
10 at Exhibit 8, you saw your signature on there,
11 correct?

12 A. Yes, sir.

13 Q. Is that a full copy of your Crash Report?

14 A. Yes, sir.

15 Q. Did you take any statements? And this is
16 not trying to be a trick question. Obviously we're
17 going to listen to some things that are on the in-car
18 video. But did you take any separate written
19 statements?

20 A. No. I talked to someone at the crash.
21 They seen the last bit of the crash. But if you
22 don't see the whole crash that's not a witness to me.
23 So I didn't get a -- I heard what she said. But I
24 didn't get a name because she wasn't a full witness.

25 Q. Understood.

1 A. And I just got the drivers' statements.

2 Q. And did you talk to her at the scene, this
3 person that you're talking about on the video?

4 A. Uh-huh.

5 Q. Okay.

6 A. Yes, sir.

7 Q. All right. Did you take any notes during
8 your investigation?

9 A. No.

10 Q. Okay. Did you see anyone taking notes at
11 the scene?

12 A. No, sir.

13 Q. Did you take any measurements at the scene?

14 A. No, sir. I just marked the scene.

15 Q. Got you.

16 And we see that in the photos. But you
17 didn't run a tape?

18 A. No, sir.

19 Q. Did you see anybody taking any measurements
20 at the scene at the time of the crash?

21 A. No, sir.

22 Q. Were there any Vehicle Inventory Sheets
23 completed? Sometimes I see those with these reports.

24 A. Let me see. I know Wingo has got it. I
25 think usually when there's stuff slung out, like

1 there was in that crash, I usually tell -- because
2 she had another family member there. I usually tell
3 them to go get whatever is valuable because there's
4 so much stuff --

5 Q. Right.

6 A. -- it's hard to write down every single
7 thing.

8 Q. Right.

9 A. So I -- I -- I tell them to go get anything
10 that's valuable out of the vehicle where if it comes
11 up missing, you're not going to be, like, trying to
12 sue Wingo's.

13 Q. Right.

14 A. So I don't know if I did inventory or if
15 that's what I just told them. Because it was a bunch
16 of, like, in the pictures, it's just -- I hate to say
17 it but it looks like just a bunch of junk.

18 Q. Right.

19 A. I mean, that's not theirs. That's the Fire
20 Department's.

21 Q. Right.

22 A. But it's just -- it looks like a bunch of
23 junk.

24 Q. Sure. Okay.

25 Did you retain any physical evidence that

1 you would have given to the Police Department or
2 would have put somewhere else? Sometimes people take
3 tire treads or certain things from the vehicle or
4 anything. Do you know if you retained any?

5 A. No.

6 Q. Okay.

7 A. If it's laying out there, the -- the
8 wrecker driver throws it back into the car and loads
9 it up.

10 Q. Understood.

11 So what I've tried to do is just make sure
12 that I've given you everything that I'm aware of that
13 you would have generated or seen. Are you aware of
14 any other documents, videos or photos related to this
15 crash?

16 A. No.

17 Q. We're already done with one thing.

18 A. Okay.

19 Q. So we got two to go.

20 A. All right.

21 Q. What I want to do now is -- and we tried --
22 I apologize. We should have requested -- we can get
23 a Post report --

24 A. Uh-huh.

25 Q. -- that just gives your background and the

1 courses that you've taken. And it's my mistake. I
2 should have gotten that sooner so I could go through
3 this quickly but I just didn't get that in time.

4 A. Okay.

5 Q. So what I'd like to do is just get some
6 brief background on you and the first thing is about
7 your education. Where did you go to high school and
8 what year did you graduate?

9 A. Haralson County High School and I graduated
10 in 2002.

11 Q. All right. And did you go to any schooling
12 after high school?

13 A. No, I graduated in May and I started the
14 State Patrol in November.

15 Q. Of 2002?

16 A. Uh-huh.

17 Q. Wow. Okay.

18 So your first job out of high school was
19 with the Georgia State Patrol?

20 A. Yes, sir.

21 Q. And what was your title?

22 A. I was a communications -- it's called CEO.
23 Communications Enforcement Officer. But it's a radio
24 operator.

25 Q. I got you.

1 A. Yeah.

2 Q. And how long were you in that role?

3 A. I had to do that for three years. I had to
4 be 21 before I go to trooper school.

5 Q. Okay. So that brings us up to about '05?

6 A. I went to trooper school January 1st of
7 2006.

8 Q. Got you.

9 And when did you graduate from trooper
10 school?

11 A. August 18th, 2006.

12 Q. Okay.

13 After you graduated trooper school what was
14 your next job or position?

15 A. I was a trooper out of the Villa Rica Post.

16 Q. Okay. And how long were you in that
17 position?

18 A. I'm -- I'm still a trooper. You just go up
19 in ranks. They came out with a -- a TFC 1, 2 and 3
20 in order of pay raises.

21 Q. Okay.

22 A. In order to get the pay raises you had to
23 take special certain classes. So my classes was
24 Recon I, Recon II and Recon III where I can get all
25 my raises.

1 Q. Okay.

2 A. So I'm still a TFC 3.

3 Q. Okay. And if I understand kind of the
4 instruction courses correctly, are they still
5 training troopers with On-scene I and On-scene II?

6 A. Yes, sir.

7 Q. Do you recall when you completed those
8 courses?

9 A. That was in -- while I was in trooper
10 school. So it was sometime --

11 Q. 2006?

12 A. 2006.

13 Q. Understood.

14 When did you take -- did you say you took
15 Accident Reconstruction Levels I through III?

16 A. I, II and III. I took them, let's see,
17 2007, 2008.

18 Q. Okay. And did you reconstruct accidents or
19 did you just have that as kind of background?

20 A. In the class you have to go out there
21 and -- and do it. They teach you how to do, like,
22 you're on the SCRT Team. But that's just the -- we
23 had to take those classes to get the raises.

24 Q. Okay.

25 A. So I later took Recon IV and V just to say

1 I -- I had it, just to say if I wanted to be on the
2 SCRT Team.

3 Q. Okay. And it only goes up to V, right?

4 A. Yes, sir.

5 Q. Okay. When did you complete Reconstruction
6 IV and V?

7 A. 2014.

8 Q. Okay. So you had completed Levels I
9 through V prior to this crash?

10 A. Yes, sir.

11 Q. Other than the reconstructions that you did
12 as part of your training, you never joined the SCRT
13 Team, did you?

14 A. No, sir.

15 Q. Okay. Did you ever reconstruct an accident
16 as part of your job duties?

17 A. No, sir.

18 Q. Okay. And in this case, you did a great
19 job of marking and documenting and photographing the
20 scene. But did you ever attempt to reconstruct this
21 accident?

22 A. No, sir.

23 Q. Okay. Got it.

24 As you sit here today, your title -- is it
25 Trooper First Class Level 3? Do I have that correct?

1 A. However you want to put it.

2 Q. Okay.

3 A. It's TFC 3. TFC -- I mean, there's really
4 no -- I'm still just classified as a trooper.

5 Q. Okay. I just want to get a little bit
6 better sense of what your job duties were.

7 So from 2006 when you first became a
8 trooper with the Villa Rica Post --

9 A. Uh-huh.

10 Q. -- what were your job duties at that point?

11 A. To enforce traffic law. So at that time I
12 think the Villa Rica was probably the busiest Post in
13 the State of Georgia. So we -- we worked a lot of
14 wrecks.

15 So crash investigation was our -- pretty
16 much our main goal in Villa Rica. And then you just
17 stop cars when you could --

18 Q. Okay.

19 A. -- enforce traffic law. Assist other
20 agencies if needed.

21 Q. Okay.

22 A. So --

23 Q. And how long were you doing that with
24 Villa Rica?

25 A. I stayed in Villa Rica from August of '06

1 to April of '09.

2 Q. Okay. And then what did you do starting
3 April of '09?

4 A. I transferred to Cedartown.

5 Q. Okay. And what were your job
6 responsibilities in Cedartown?

7 A. Same thing. Crash investigation, enforce
8 traffic law.

9 Q. And how long were you doing that?

10 A. I was in Cedartown until they closed it
11 down of October 2012. I stayed in that territory,
12 just worked out of Rome for 2014. Then they moved us
13 to Cartersville and then they moved us to Paulding.

14 But it was the same thing: Crash
15 investigation, traffic law, enforce traffic law.

16 Q. I got it.

17 A. I just moved all over the northwest.

18 Q. So where is your Post now?

19 A. I am under Trooper C command. I'm in the
20 Implied Consent Division.

21 Q. And when did you take that post?

22 A. December of last year. And I left Paulding
23 to go work at the Capitol Security for the Georgia
24 State Patrol from 2016 to 2018.

25 Q. So you were working as a trooper enforcing

1 traffic laws from '09 to 2012, is that right, at
2 Cedartown?

3 A. Yes, sir.

4 Q. And then from '12 to '16 you were kind of
5 doing the same thing but at various locations --

6 A. Yes.

7 Q. -- in northwest Georgia?

8 A. Yeah. Rome, Cartersville and Paulding.

9 Q. And then '16 to '18 you were doing security
10 at the Capitol?

11 A. Yes, sir.

12 Q. And since December of '18, you were working
13 with Troop --

14 A. Troop C command.

15 Q. And tell me what you're doing there.

16 A. I certify and -- intox machines. So the
17 breath machines where someone does a breath test. I
18 run the test on that to make sure everything is
19 working properly and I keep everything updated.

20 Q. Okay. And are you out in the field or are
21 people just bringing you those machines?

22 A. No, I go to different locations in Fulton,
23 DeKalb and Clayton Counties. That's my area.

24 Q. Okay. And you're just kind of going
25 regularly to make sure that those machines are --

1 A. Up and running.

2 Q. Gotcha. Understood.

3 Okay. Great. Have we covered your

4 complete timeline of your work history --

5 A. Yes, sir.

6 Q. -- in law enforcement?

7 A. Yes, sir.

8 Q. Great.

9 Then I think I have -- you know, I think

10 we've already talked about the fact you have On-scene

11 I and II. You have Accident Construction I through

12 V. Are there any other courses that would in any way

13 relate to your investigation of this crash that we

14 should know about?

15 A. No, sir.

16 Q. All right.

17 All right. Now, here's the question you

18 get to brag on. All right. What is your best

19 estimate of how many crashes you have investigated?

20 And best estimate is good enough for us. Is it 500,

21 2,000?

22 A. We would probably work 300 apiece or more a

23 year in Villa Rica. So I was in Villa Rica for two

24 and a half years. And then, let's see, that's about

25 600. Paulding was about -- I probably -- maybe

1 2,000. 2500 maybe.

2 Q. Okay.

3 A. I don't know.

4 Q. Okay. Understanding we're not looking for
5 a, you know, precise number.

6 A. Oh, yeah.

7 Q. But your best estimate is somewhere around
8 2,000, 2500?

9 A. I would say something like that.

10 Q. Okay. And while you haven't reconstructed
11 any accidents in the field, how many accidents do you
12 think you've reconstructed in your courses?

13 A. In the training?

14 Q. Yes.

15 A. I think we've done one every -- every --
16 like, Level I you would do one. Level II you would
17 do one, like, you would go out there and you'd do it
18 as a team.

19 Q. Understood.

20 A. Now, me doing one completely by myself,
21 never.

22 Q. Okay. Gotcha.

23 So if we're estimating, you know, around
24 2500 crashes that you've investigated, can you give
25 us an estimate of about how many rollovers you've

1 investigated? Is it more than ten?

2 A. Oh, yes, it's more than ten. Probably a
3 couple hundred.

4 Q. Okay.

5 A. Yeah.

6 Q. And have you seen all types of vehicles
7 roll over, SUVs, sedans, you know, kind of passenger
8 cars?

9 A. Yes.

10 Q. Have you seen basically most types --

11 A. Yes.

12 Q. -- of vehicles roll over? Okay.

13 Have you ever experienced a rollover as an
14 occupant, whether a driver or a passenger?

15 A. Have I ever been in a rollover?

16 Q. Yes, sir.

17 A. No, sir.

18 Q. Okay.

19 A. Well, yes, sir, I have been. I have been
20 in a crash where I flipped, yes, sir.

21 Q. Okay. There's a surprising --

22 A. I forgot about that one. Yeah.

23 Q. There's a surprising number of people who
24 have been.

25 A. Yeah.

1 Q. Was that on the job or was this before you
2 were --

3 A. I was 16.

4 Q. Okay. Gotcha.

5 A. Yeah.

6 Q. What kind of vehicle were you in?

7 A. I was in an S-10.

8 Q. Okay. And were you injured as a result?

9 A. Broke my wrist.

10 Q. But that's it?

11 A. Uh-huh.

12 Q. Anybody else injured in the vehicle?

13 A. No, it was just me.

14 Q. Okay.

15 It sounds like you've driven probably
16 pickup trucks. I understand that.

17 A. That was my first car.

18 Q. Okay.

19 A. Vehicle.

20 Q. Have you driven SUVs?

21 A. Yes, sir.

22 Q. Kind of as your primary means of
23 transportation?

24 A. I used to have a Suburban. So yeah.

25 Q. Do you think SUVs handle differently than

1 passenger cars?

2 MR. PARRISH: Object to form.

3 A. Yes.

4 Q. (By Mr. Boorman) And this is a long shot
5 but I'm just going to ask it.

6 Have you ever spoken at any seminars or
7 anything like that, done any training for other
8 folks?

9 A. No, sir.

10 Q. Okay. Have you ever been -- there are
11 certain experts, I'm sure you've heard about this,
12 like, we all have experts that we've hired in this
13 case.

14 Have you ever been hired by a lawyer to be
15 an expert in any lawsuit?

16 A. No, sir.

17 Q. And I believe you've given two depositions
18 before; is that right?

19 A. Yes, sir.

20 Q. Have you ever testified at trial?

21 A. Yes, sir.

22 Q. How many times have you testified at trial?

23 A. Crashes or just DUIs or --

24 Q. I'm talking everything.

25 A. Fifteen to 20 times maybe.

1 Q. Okay.

2 A. Yeah.

3 Q. And have you been qualified as an expert at
4 trial or are you just coming in to say, "This is what
5 I observed"?

6 A. This is what I observed. I worked the
7 accident. This is -- or -- or DUI cases.

8 Q. Gotcha.

9 A. Not -- not expert.

10 Q. Gotcha.

11 Have you ever given an opinion that any
12 product is defective?

13 A. No, sir.

14 Q. Okay. And has your -- you may not know
15 this. But has your testimony ever been limited in
16 any way, like --

17 A. Saying I couldn't use --

18 Q. Couldn't say something that you intended to
19 say. You may not know that. But I'm just -- to your
20 knowledge, has it ever been limited?

21 A. Not -- not that I'm aware of.

22 Q. Okay. All right.

23 A. I mean, you can't -- you can't say in a DUI
24 trial what they blow on the Alco-Sensor.

25 Q. Okay.

1 A. All you can say is positive and negative.
2 That's the only thing that you cannot say if that's
3 what you're talking about.

4 Q. Okay. Yeah. I just wanted to know if --

5 A. No.

6 Q. -- there were any parameters kind of put on
7 your testimony.

8 A. Yeah. You can't -- you can't testify on
9 what they blow on Alco-Sensor. You can just say
10 positive or negative.

11 Q. Ha. I didn't know that. Okay.

12 Have you ever worked for any auto
13 manufacturer?

14 A. No, sir.

15 Q. All right. Other than working for the
16 Georgia State Patrol, have you had any other jobs
17 after high school?

18 A. I was in high school, I worked at a grocery
19 store bagging groceries.

20 Q. Okay. But you never -- did you ever work
21 at, like, car repair shop or --

22 A. No. Nope. No, sir.

23 Q. Okay.

24 And this crash involves a 2000 Ford
25 Explorer. Have you ever driven a Ford Explorer?

1 A. My friend's Ford Explorer, yes, sir.

2 Q. Okay. Do you have any idea what model year
3 that may have been?

4 A. That had to have been, like, in the
5 nineties --

6 Q. Okay.

7 A. -- because we was young.

8 Q. Did you drive that more than ten times?

9 A. No.

10 Q. Okay. And what vehicles do you currently
11 own?

12 A. I have a Jeep. I have a Mustang and I have
13 a truck.

14 Q. And what kind of Jeep is that?

15 A. It's a 2016 Jeep Wrangler.

16 Q. Did you take that JeepFest?

17 A. No, I'm not that -- I'm not that hard core.

18 Q. I drive by that JeepFest course all the
19 time. We got a cabin up that way.

20 And what year is your Mustang?

21 A. '05.

22 Q. Okay. And what kind of truck do you have?

23 A. '94 Z71.

24 Q. All right. I understand that you probably
25 don't know but I just want to make sure.

1 For this specific 2000 Ford Explorer that
2 was involved in this crash, do you know what the
3 service and repair history was?

4 A. No, sir.

5 Q. Do you know whether it had been involved in
6 any other crashes prior to this crash?

7 A. No, sir.

8 Q. And I'm going to ask you a couple more
9 specific questions when we look at photos. But since
10 you had a chance to look, just kind of flip through
11 them real quick.

12 Did you make any observations about the
13 condition of this Explorer and what it may have been
14 prior to the crash?

15 A. No, sir.

16 Q. Okay.

17 All right. To the third part.

18 A. All right.

19 Q. Moving along quickly. And do you need a
20 break?

21 A. No, sir.

22 Q. Or are you still good to go? Okay. We'll
23 obviously spend more time on this because we're going
24 to talk about the crash and a few things.

25 A. Okay.

1 Q. So am I correct this crash happened on
2 Christmas, December 25th of 2015?

3 A. Yes, sir.

4 Q. All right. And the crash happened
5 approximately 3:34 p.m.?

6 A. Yes, sir.

7 Q. And, you know, we're -- I'm just trying to
8 make sure that I'm confirming what's in the Police
9 Report but please double-check me.

10 And it looks like -- did you arrive at
11 about 3:45 p.m.?

12 A. Yes, sir.

13 Q. And you left at 4:58 p.m.?

14 A. Yes, sir.

15 Q. All right.

16 And this crash happened on Corinth
17 Poseyville Road in Haralson County?

18 A. Yes, sir.

19 Q. Are you pretty familiar with that road this
20 crash was on?

21 A. Yes, sir. I live, like, 35 minutes from
22 it.

23 Q. Okay.

24 A. Uh-huh.

25 Q. Was this an area where there was a lot of

1 crashes or not really?

2 A. Usually when there's a crash on this road
3 it's a pretty serious crash.

4 Q. Do you have any idea why that is?

5 A. No, I don't.

6 Q. Okay.

7 A. I mean, it's curvy. But it shouldn't be
8 where you would wreck all the time.

9 Q. Okay.

10 A. Which I'm not saying there's a lot of
11 wrecks out there. I'm just saying but when there are
12 wrecks they're usually pretty serious wrecks.

13 Q. A country road that people maybe go a
14 little faster than they might ought to?

15 A. Yes, sir.

16 Q. Okay. So who was the driver of this 2000
17 Explorer?

18 A. Cindy -- wait. Wait. Wait. Making sure.
19 Yes, Cindy Pollard.

20 Q. Yes.

21 A. Yes.

22 Q. And I won't try to do this intentionally
23 but I believe her name is Cindy Cosper now.

24 A. Okay.

25 Q. But just so you know --

1 A. Okay.

2 Q. -- I'm going to try to use Pollard because
3 that's what's in the report.

4 And was the front passenger Mr. Ronnie
5 Ammerson?

6 A. Yes, sir.

7 Q. Okay.

8 And I want to get back to the video for a
9 second. And I'm going to start the video at 1:30 and
10 then I'm going to show it to you just until basically
11 we can see you get out of the car and then I'll mark
12 the time of that. Stop me if there's anything that
13 you want to comment on.

14 All right. And I'm stopping the video at
15 around 1:57.

16 A. Okay.

17 Q. Do you recognize -- is that you that gets
18 out of the car around 1:50 or something like that?

19 A. Yes, sir.

20 Q. All right. Who was already on the scene
21 when you get there?

22 A. There's a Haralson County deputy.

23 Q. Do you remember who that is?

24 A. He's a sergeant now. I'm trying to think
25 of his name.

1 I don't know his name.

2 Q. That's okay. We --

3 A. I've been gone from there for about three
4 years. So it's hard to --

5 Q. We've got documentation. I just want to --
6 but we may not have perfect documentation about kind
7 of who got there exactly when.

8 A. Yeah, he was there before me. There was
9 another sergeant. I got his name. Randy Entrekin.
10 He showed up later. He was the other deputy that
11 showed up. And then there was Haralson County Fire
12 Department.

13 Q. Okay. Then I'm going to show you a little
14 more video.

15 You walk up to somebody. And I want to
16 make -- and I think we're all going to -- I think we
17 all know that that's Ms. Pollard or Ms. Cosper. And
18 I just want to see if you recall that. So I'm going
19 to start it again at 1:57.

20 (WHEREUPON, a video was played.)

21 Q. (By Mr. Boorman) And I stopped it at about
22 two minutes and 30 seconds.

23 Are you at that point approaching
24 Ms. Pollard?

25 A. Yes, sir.

1 Q. Okay. As you could hear, the audio was a
2 little bit tough to hear.

3 A. The fire trucks is really loud.

4 Q. Okay. And I might ask you some questions
5 about a conversation a little bit later. But do you
6 recall what Ms. Cosper told or Ms. Pollard told you?

7 A. She told me that she was -- I watched the
8 video the other day. So she was on her way from
9 Bremen so that was the correct direction she would be
10 traveling.

11 And I asked her if she had been drinking.
12 She said no. Asked her if she had taken any kind of
13 medication. She said no. I didn't smell anything.
14 I didn't observe anything in her eyes that would, you
15 know, possibly think otherwise.

16 And I asked her what happened. She said
17 that she had -- was thinking about other things and
18 ran off the road. And I asked her if she was
19 speeding. She said she wasn't speeding. And I said,
20 "So you run off the road and overcorrected and lost
21 control" and she said yes.

22 Q. Okay. I'm going to play at 5:10 and
23 hopefully we can hear this okay. But basically some
24 of what you just said.

25 (WHEREUPON, a video was played.)

1 Q. (By Mr. Boorman) All right. That
2 conversation, that clip that we just listened to that
3 starts at about 5:10, that's exactly what you just
4 told us, right?

5 A. Yes, sir.

6 Q. And while there is some background noise,
7 you can hear Ms. Pollard say that she was thinking
8 about something else and went off the road?

9 A. Yes, sir.

10 Q. All right. Did she make those statements
11 shortly after the crash?

12 A. Yes, sir. I got there pretty quick. You
13 know, I was -- on Christmas Day how we do things, we
14 work in segments so we can stay at the house. Even
15 though you're on call, you just got to be -- once you
16 get a wreck you have to leave.

17 Luckily that was right by my house so the
18 only thing I do is put my uniform on and go. So --
19 or if I had my uniform on I probably been there even
20 faster.

21 Q. Understood.

22 A. So --

23 Q. So you were there just within minutes of
24 this crash happening?

25 A. Yes.

1 Q. Was it your observation that Ms. Pollard
2 was still visibly shaken up from the crash?

3 A. Yes. You can hear it in her voice that
4 she's -- she's still shaken up from the crash. And
5 also their dad was still being cut out of the car.
6 Or not -- you know, the seat belt was -- had him
7 pinned up where they had to cut the seat belt off
8 him.

9 Q. And I can play you the clip. But do you
10 recall later is she gets upset and is crying, talking
11 to you?

12 A. Yes. And I'm writing, explaining the
13 ticket, she's crying.

14 Q. Okay.

15 A. Want to know -- I think I even told her how
16 to get to Grady.

17 Q. Okay. So I know you weren't there but I'm
18 wondering if you may have learned this at some point.
19 Do you know who the first person to Ms. Pollard was?

20 A. No, sir.

21 Q. Do you know who the first person to
22 Mr. Ammerson was?

23 A. No, sir.

24 Q. Okay. Do you know who provided treatment
25 to Ms. Pollard?

1 A. No, sir. When -- usually I don't -- when
2 they're working, like, they -- like, they were
3 cutting the vehicle, trying to get him out, I stay
4 back because I don't want to get in their way. I'm
5 not trained like they are.

6 So I try to get everything I need before I
7 go talk to -- but luckily -- I mean, not luckily but
8 I didn't really need to speak to him because he
9 wasn't my driver.

10 Q. Understood. Okay.

11 So do you have a written protocol for
12 investigating an accident that you would use at the
13 time, that you used at the time of this crash?

14 A. No, sir. Every -- every trooper is
15 different. That's part of the last three months of
16 trooper school. We get sent to a different Post
17 every month to ride with someone different. To see
18 how they work. And we just try to put it -- how
19 it's -- kind of like you see everybody's way of
20 working and then you just come up with your own.

21 Q. Understood.

22 Did you, while not written down, did you
23 kind of have your own kind of procedural or process
24 that you would use for investigating an accident or
25 would it depend based upon what you were rolling up

1 on?

2 A. It really depends on what you're rolling up
3 on. If I have a crash like this where I know a
4 helicopter is coming, I try to get all the
5 information that I can at that time where I don't
6 have to go to Grady or go to Atlanta Medical if I
7 don't have to go.

8 Q. Okay.

9 A. So I was trying to get all the information,
10 his information, just in case where I didn't have to
11 drive to Atlanta Medical Center or Grady.

12 Q. Okay. And I think the video, the in-car
13 video that I have, is about -- it's right at about
14 32 minutes or something along those lines.

15 A. Uh-huh.

16 Q. Maybe 33 minutes. I understand you
17 recently had an occasion to, you know, take a look at
18 that. I'm happy to play you any part of that or the
19 whole thing.

20 But what I'd like to know is, can you just
21 walk us through what you did and what you observed at
22 the scene? And I'm happy to show you any photo or
23 you can look at any photo or look at the video.

24 A. No. Once I got her statement and once I
25 got all the information that I needed from him, they

1 gave me his ID card. So we had computers in our car.
2 So you just take all their information, run it back
3 to make sure everything is -- this is what they give
4 you.

5 So once I had all the information, Life
6 Flight came and got Mr. Ammerson. And I tried to get
7 Cindy out of there as fast as possible. I mean, that
8 is her father going to Grady. So I was trying to get
9 her the information she needed. Driver's license
10 back, explain how she can get a copy of the Accident
11 Report. Where -- who to call for the Accident
12 Report. And also issue her the citation and explain
13 the citation, where she could pay it or go to court.

14 Q. Understood.

15 A. Once I got all that out of the way is when
16 I started to try to move vehicles where I can
17 document everything on the road.

18 Q. Okay. Understood.

19 And then when you say "document everything
20 on the road," did you mark it with paint?

21 A. Yes, sir.

22 Q. All right. And tell us what your practice
23 is. And we can look at some of these photos in a
24 minute. But what do you try to do with the paint
25 marks or are there things we should know about how

1 you mark with paint?

2 A. One trooper taught me in Cartersville. I
3 rode with seven different people in Cartersville. I
4 don't even know who it was. But we worked a serious
5 crash. And he says, "You want to start off" -- she
6 ran -- she did run off the road a little bit further
7 back.

8 There was another vehicle that just backed
9 on up. So instead of me trying to find out who it
10 was, I didn't -- I just started -- I seen where it
11 was. It's a little bit further back where she ran
12 off and then I started to mark.

13 So when you have indentions off the roadway
14 we use flags. So then when it gets on the roadway, I
15 usually mark skid marks and yaw marks by dots. Once
16 those yaw marks or skid marks stop and you have a --
17 straight gouge marks or any other kind of damage, I
18 usually put it in, like, a parentheses where
19 something new was starting. It don't mean anything
20 spectacular. It's just how I work the wrecks.

21 So then you have -- and then once you have
22 this, then I go back to off the road where you have
23 back to flags. And that's where I just put a flag
24 right there where the tires were. So if -- if, let's
25 say, that Mr. Ammerson died later that night, I would

1 have called the SCRT Team because it would have been
2 a SCRT Team wreck.

3 Now, in -- in Troop A, every troop is
4 different. Because this is family, you would still
5 make the phone call to SCRT and say, "Hey, I had a
6 wreck today. It was prosecutable. The driver was
7 not drinking, there was no medications but she killed
8 her father."

9 They would probably said, "We're not coming
10 out there. It's family." They're not going to
11 prosecute family. Just, you know -- but I marked it
12 just in case.

13 Q. Uh-huh. Understood.

14 A. So -- but let's say Mr. Ammerson was a
15 friend and he would have died. Then SCRT Team would
16 have came out. All my stuff would already been
17 marked. Then they would have took the actual
18 measurements.

19 Q. Does it have to be a fatality for SCRT to
20 come out or could it be a serious injury?

21 A. It could be a serious injury where you
22 have, like, paralyzed or, you know, coma or, you
23 know, something that's going to be life-changing.

24 Q. Understood.

25 A. They can come out there. They can, you

1 know, do the same thing as if it was a fatality.

2 Q. Okay. Then just a few check the box
3 questions I need to ask you.

4 After you left the scene on this day of the
5 crash, did you ever return to the scene for any
6 reason?

7 A. To make sure any, like --

8 Q. Do any additional investigation?

9 A. No. I came out, what was it, about a month
10 later, month or two later when you came out?

11 MR. PARRISH: I'm not allowed to talk --

12 THE WITNESS: Okay.

13 MR. PARRISH: -- during this part.

14 A. Okay. Well, whenever we went back out, the
15 road had already been paved. So there was nothing
16 there any more.

17 Q. (By Mr. Boorman) Okay.

18 A. But nothing -- nothing from me. Nothing on
19 my end for a further investigation about this wreck.

20 Q. Understood.

21 About a month after this crash, did you go
22 back out to the scene with Mr. Parrish?

23 A. It was -- it was some -- I don't know if it
24 was a month or two. But yeah, I went back out. But
25 the road has already been paved and I just kind of

1 put them in the spot where it happened.

2 Q. Okay. Was Mr. Parrish there at this
3 second -- at this visit to the scene?

4 A. It's been so long ago. There was two or
5 three guys. I couldn't tell you if it was actually
6 him or not.

7 Q. Okay. Do you remember anybody or did you
8 write down anybody's name?

9 A. No, I didn't write -- huh-uh. No, sir.

10 Q. Do you know if it was people who were
11 working on behalf of Ms. Pollard or Mr. Ammerson?

12 A. I can't remember the full conversation. I
13 just met -- went out there and -- and met with them.

14 Q. Okay.

15 At that time, did you take any photos?

16 A. No, sir.

17 Q. Okay. Did they take any photos?

18 A. I -- I don't recall.

19 Q. Did you take any statements?

20 A. We just talked about the crash. But
21 nothing where I would write anything down. Like, I
22 don't even remember what I even said. Probably the
23 same thing I'm -- I'm telling you.

24 Q. Sure.

25 A. But I really don't know what was said.

1 Q. Do you know if they recorded, either by
2 audio or video, anything that you were explaining?

3 A. Not that I was aware of.

4 Q. Okay.

5 After the day of this crash did you ever
6 see the Explorer again?

7 A. No, sir.

8 Q. And after the day of this crash did you
9 ever communicate with any of the occupants or
10 eyewitnesses?

11 A. No, sir. Usually the -- if he would have
12 died, the hospitals are pretty good about notifying,
13 even if it's, like, the person that they bring in.
14 And then they notify us that it became a fatality or
15 they'll notify our radio room. So I don't really do
16 any checkups.

17 It's hard to get -- if you ever had to call
18 Grady, it's hard to try to get some good information.
19 So usually if something, a terrible outcome happens,
20 they usually notify us.

21 Q. Understood. Okay.

22 Other than this meeting about a month or
23 two after the crash, have you met with anybody else
24 related to this crash?

25 A. I have but I don't know who they was

1 representing. Someone came to the Capitol probably
2 2018.

3 Q. Okay.

4 A. Maybe.

5 Q. But you don't remember who that is?

6 A. I don't remember who it was. I just know
7 it was a white gentleman.

8 Q. Okay.

9 A. Couldn't tell you his name. Probably
10 wouldn't even tell you if he walked in right now who
11 it was.

12 Q. Okay.

13 A. He came up. We talked about the crash.
14 Asked me similar questions about 30 minutes to an
15 hour.

16 Q. Okay.

17 A. And that was it.

18 Q. All right. Anybody else that you've met
19 with?

20 A. No, sir.

21 Q. All right.

22 Before this crash, did you know either of
23 these occupants, either Ms. Pollard or Mr. Ammerson?

24 A. Did I know them?

25 Q. Yes.

1 A. No, sir.

2 Q. Did you know anything about them or their
3 families or anything like that?

4 A. No, sir.

5 Q. Okay.

6 Other than what we discussed, did you do
7 any other investigation related to this crash?

8 A. No, sir.

9 Q. Then I want to show you a couple things and
10 I'm going to apologize. But I'm just -- to move
11 through this quickly --

12 A. Okay.

13 Q. -- I'm going to take some of the photos out
14 and then we can put them back in order if you want.
15 But let me just show you -- and I guess before I do
16 that, we've been going over an hour. Do you need a
17 break?

18 A. No, I'm good.

19 Q. Okay. You just let me know if you do.

20 A. Okay.

21 Q. So I'm going to show you what -- at the
22 bottom numbers is what I'm talking about. 79 through
23 81.

24 Are those the photos of the point of rest
25 of this Explorer?

1 A. Yes, sir.

2 Q. Okay.

3 If you can take a look at Photo 80 and tell
4 me what debris is around there. Can you identify
5 anything for us?

6 A. Of the vehicle or are you just talking
7 about, like, bags and clothes and bottles and --

8 Q. Yeah. Anything that stands out to you that
9 you believe was in the vehicle.

10 A. I can't remember if that was a Bud Light
11 can or -- but I don't know. But I did notice that.
12 But -- but it's just mainly junk.

13 Q. Okay. Gotcha.

14 A. Yeah. And like I said, all the stuff,
15 like, the cords and all that kind of stuff like that,
16 that's the Fire Department's where they had to use
17 extraction to get -- to get him out.

18 Q. Okay. Do you see the passenger side
19 headlight?

20 A. Right here?

21 Q. Yes, sir. What is that on the front?

22 A. I don't know what that is.

23 Q. Almost looks like wrapping paper or
24 something. I just didn't know if you knew what it
25 was.

1 A. No, I didn't know what it was. I didn't
2 know if it came out and -- I don't know what it was.

3 Q. Okay. Just stood out to me so I thought
4 I'd ask you.

5 If you can go to the next photo, which is
6 81.

7 A. Okay.

8 Q. And again, can you tell me -- can you
9 identify specific debris that's in there. Let me
10 point something out to you.

11 A. Okay.

12 Q. To the back of the Explorer it looks like a
13 couple of, like, wood pedestals or something like
14 that. Do you know what those were?

15 A. That looked like those little coffee
16 tables.

17 Q. Okay.

18 A. You know, like, they're hard to -- you
19 don't really see those type of coffee tables any
20 more. Those are the old school round ones, yeah. I
21 don't know if they was carrying them in the back but
22 that was theirs.

23 Q. Okay. Anything else? Any other debris
24 that you can recall that you believe was in the
25 Explorer at the time of the crash?

1 A. No, sir.

2 Q. Okay.

3 It looks to me like there was extrication
4 equipment used on this Explorer?

5 A. Yes, sir.

6 Q. Did they cut the driver's side A-pillar?

7 A. Yes, sir.

8 Q. And they just completely cut it off?

9 A. Yes, sir.

10 Q. All right. And did they cut part of the
11 driver's side B-pillar? You see that big piece
12 that's standing up?

13 A. Yes.

14 Q. Maybe not the whole B-pillar but a portion
15 of it?

16 A. Yeah. Just cut it where they can take the
17 top off.

18 When I got there he was laying over
19 sideways. So what they was trying to do was to try
20 to pick him up because he was a big, big guy.

21 Q. Yeah.

22 A. And they was trying to get enough people to
23 pick him up where they could slide the backboard up
24 under him.

25 Q. Okay.

1 A. And then just pull him out.

2 Q. Then I'm glad I'm asking this. But by the
3 time you had got there, had they already cut the
4 driver's side A-pillar?

5 A. Yes, sir. They already -- was already
6 cutting stuff. And they was -- that's what that
7 noise was so loud. They was -- they was cutting.
8 Then you had the fire trucks. And then it was even
9 louder when the -- when you heard the helicopter.

10 Q. Okay. I just want to focus on: We've
11 already talked about the driver's side A-pillar and
12 the driver's side B-pillar. Did somebody break out
13 the windshield or do you know if that was broken out
14 as part of the crash or do you not know one way or
15 the other?

16 A. I don't know --

17 Q. Okay.

18 A. -- about -- I assumed if they broke that
19 and broke and cut this, they pulled it back. But,
20 you know, I -- I don't know.

21 Q. Okay.

22 A. What was -- I wasn't there when they was
23 cutting.

24 Q. Understood.

25 Did they cut the passenger side A-pillar?

1 A. Like I said previously, usually when
2 they're over there cutting and working, like I said,
3 they was cutting when I was there but I didn't go
4 over there. When they're working I try to stay
5 clear.

6 I found out Ms. Cindy was my driver so that
7 was my main focus.

8 **Q. Understood.**

9 A. And there was a lot of people over there.
10 So I would have just been in the way.

11 **Q. Okay.**

12 A. Because I don't -- I don't know what -- how
13 to do what they're doing.

14 **Q. Okay.**

15 A. So I would have just been in the way so I
16 stay clear of it.

17 **Q. Did you walk up to the vehicle while**
18 **Mr. Ammerson was still in the Explorer?**

19 A. No, sir. I seen him from a distance and I
20 could see what they was doing.

21 **Q. Okay.**

22 A. That's how I know they was trying to pick
23 him up to slide that up under there. Because when I
24 was standing by Cindy, I was behind her and I was
25 trying to listen to her statements, smell any odor,

1 if there was any odor coming from her.

2 And, you know, I was also looking at the
3 scene. And that's when I seen how they was trying to
4 get him out.

5 Q. Okay. But you're basically just seeing
6 this from the road. It's not like you walked up --

7 A. Yes.

8 Q. Okay. Was he still seated in the front
9 passenger seat?

10 A. He was laid over. Now, he was in the front
11 passenger seat but he was just laid over. Like, I
12 don't even know if the seat belt was still on him or
13 not. I know they had to cut it off of him. But,
14 like, I just seen him laid over.

15 Q. If we all want to try to figure out what
16 his position was at the point of rest, it sounds like
17 we need to talk to the person who was first to him.

18 A. Yes, sir.

19 Q. Is that fair?

20 A. Yes, sir.

21 Q. Okay.

22 All right. Do you see, on the passenger
23 side, kind of near the cargo area, is that something
24 the Fire Department put there? Is that, like, a --

25 A. Are you talking about the red? Or are you

1 talking about --

2 Q. I'm talking about that inflatable --

3 A. Oh, that's to lift. They put that up under
4 there trying to lift the -- the vehicle up a little
5 bit.

6 Q. Okay.

7 A. Yeah.

8 Q. All right. And then did I give you
9 Photo 82I may not have given you that. Let me just
10 give you that one real quick. There you go.

11 And again, we see some equipment from the
12 Fire Department and then some other things, other
13 debris that is in there. Can you recognize anything
14 else that was in the vehicle at the time of the
15 crash?

16 A. I mean, it looks like a pillow. Just some
17 bottles and stuff. But yeah.

18 Q. In the previous photo, in 81, did you say
19 you found a -- was it a Bud Light can?

20 A. Well, I don't know. I can't remember. I
21 don't really remember or recall. It looks like one.
22 I may have looked into it to see if there was any
23 more. I really -- I really can't tell you yes or no
24 if it is or not.

25 Q. Okay.

1 Did you ever determine if Mr. Ammerson was
2 drinking?

3 A. No, sir. I didn't get close enough to him
4 to -- to smell anything on him. I never got that
5 close.

6 Q. Okay.

7 A. Like I said, once I found out that she was
8 my driver, my focus was on her.

9 Q. All right. Then I'm going to hand you 71.
10 And we can see some flags. Is that where the
11 Explorer went off the road, to the right or the east
12 side of the roadway?

13 A. Yes, sir. And like I said -- is this the
14 very first picture?

15 Q. Yes, sir.

16 A. Yeah. And like I said earlier, there was a
17 vehicle, like, right here and it went back just a
18 little bit further. But it wasn't nothing like --
19 pretty much how this one is, just -- just started
20 out.

21 Q. Okay. Do you have an estimate of how many
22 feet the right side tires of the Explorer were off
23 the road?

24 A. No, sir.

25 Q. Okay. And the reason why the Explorer went

1 off the road to the right where you have marked there
2 on Photo 71 is because Ms. Pollard was thinking of
3 other things?

4 A. Yeah. Before you get to this somewhat
5 straightaway right here, there is a curve that goes
6 back. Like, she just came out of a curve to go into
7 the somewhat straightaway.

8 So I don't know -- I don't know if she came
9 out of the curve and, like, she told me other things
10 and that's how she dropped off. I mean -- but yeah.
11 I don't know if that -- if you needed to know that.

12 Q. I did. Thank you.

13 But I'm just trying to understand what you
14 found in your investigation. As part of your
15 investigation when she told you she was thinking of
16 other things and went off the road --

17 A. Uh-huh.

18 Q. -- is that this area right here?

19 A. Yes, sir. Yes.

20 Q. Okay. Understood. Okay.

21 Did you, in your investigation, did you
22 find anything in the roadway that would have caused
23 her to leave the road at that point?

24 A. No, sir.

25 Q. All right.

1 Then I'm going to hand you Photo 73. And
2 is this where you mark the tire marks from the left
3 side or driver's side tires?

4 A. Yeah, these are the left driver's side
5 tires. This is where the yaw marks start.

6 Q. Okay. And here, from the point that we
7 looked at in Photo 71 when the tires are off the
8 road, was it your -- did your investigation conclude
9 that Ms. Pollard overcorrected to the left and that's
10 what caused the driver's side tires to cross double
11 yellow lines?

12 A. Yes, sir.

13 MR. PARRISH: Object to form.

14 Q. (By Mr. Boorman) As part of your
15 investigation, did the Explorer travel into the --
16 what we see in Photo 73, the oncoming lane of traffic
17 because of that overcorrection to the left?

18 A. Yes, sir.

19 Q. All right. And Ms. Pollard told you, as we
20 talked about before, that she admitted she did
21 overcorrect; is that true?

22 A. Well, she told me she had other things on
23 her mind. And then when she told me that, I asked
24 her, "That's when you overcorrected and lost
25 control?" And she said yes.

1 Q. Understood.

2 Then I'm going to show you Photo 74. And
3 that's those same tire marks that we've been talking
4 about in Photo 73, correct?

5 A. Yes, sir.

6 Q. And why do these driver's side tire marks
7 get wider?

8 A. The vehicle is starting to turn in a
9 clockwise rotation.

10 Q. Okay.

11 A. So the back end is coming around.

12 Q. As part of your investigation, did you
13 conclude that this vehicle starts a clockwise
14 rotation because Ms. Pollard overcorrected to the
15 right?

16 A. She over -- yeah, she ran off the road.
17 She overcorrected to the left. And I'm not -- most
18 drivers, I'm not going to say all drivers, but most
19 drivers, once they run off the road they overcorrect.
20 And then it shoots -- most of the times the vehicles
21 shoot and they freak out and they overcorrect again.
22 And that's when usually the wreck starts to happen.

23 Q. And that's exactly what happened here,
24 right?

25 A. Yes.

1 Q. Okay. So is part of your investigation you
2 found an overcorrection to the left and then
3 overcorrection to the right and then a rollover?

4 A. Yes, sir.

5 Q. All right.

6 And where these tire marks stop in Photo 74
7 is where the Explorer becomes airborne?

8 MR. PARRISH: Object to form.

9 A. What's -- what's 75?

10 Q. (By Mr. Boorman) Sure.

11 Well, let me just -- let me ask -- let me
12 ask you a different question.

13 A. Okay.

14 Q. Do you know why those tire marks stop in
15 74?

16 A. Well, those are gouge marks. They -- they
17 stop yawing and go to gouge marks, which means
18 sliding or -- or -- or usually rims digging into the
19 road.

20 Q. Okay.

21 A. Or sliding of the vehicle and then they can
22 be considered gouge marks.

23 Q. And you may not have made a finding. If
24 you didn't, just tell me that. But at the end of
25 these tire marks that are in 74 --

1 A. Uh-huh.

2 Q. -- did you make a determination as to
3 whether that's the point that the Explorer tips up
4 and begins to roll or did you not make any
5 conclusion?

6 A. I didn't make any conclusion --

7 Q. Okay.

8 A. -- just then. But, I mean, I do see where
9 there's over -- overturn and then overturn and then
10 final rest.

11 Q. Okay. And I think I can short -- I
12 certainly don't want to ask you anything --

13 A. Oh, yeah.

14 Q. -- that you didn't, you know, spend the
15 time and reconstruct and that --

16 A. Uh-huh.

17 Q. -- sort of thing. It's not my intention to
18 try to get you to do that for us today.

19 A. Oh, yeah.

20 Q. So let me ask you this question. It might
21 shortcut a few questions.

22 Do you defer to experts who reconstruct
23 this accident as to what specific parts of the
24 Explorer impacted the ground after those tire marks
25 until the point of rest?

1 MR. PARRISH: Object to form.

2 Rephrase.

3 MR. BOORMAN: Sure.

4 MR. PARRISH: Rephrase it.

5 MR. BOORMAN: Yeah.

6 Q. (By Mr. Boorman) Would you defer to other
7 accident --

8 A. Like, a SCRT Team?

9 Q. Just accident reconstruction --

10 A. Okay.

11 Q. -- experts who are working on the case?
12 Would you defer to them as to this specific vehicle
13 movements after those tire marks, from the end of
14 those tire marks to the point of rest?

15 MR. PARRISH: Object to form.

16 A. I mean, sometime -- I mean, I have done
17 that before where I just marked the scene and I'm
18 just sitting there looking at it.

19 Q. (By Mr. Boorman) Right.

20 A. Where you have the two vehicles and you
21 have vehicles going everywhere, you know, I need help
22 with someone that knows more stuff about it. Usually
23 I just mark the scene with this one. And I really
24 didn't -- I know this sounds terrible but I really
25 didn't put that much.

1 I did put the effort into it. That's my
2 job. But I didn't go all the way into reconstruction
3 this wreck before -- this wreck because it's such a
4 simple wreck.

5 Q. Right. Let me ask -- I've done a bad job
6 of -- I understood what you're saying and let me ask,
7 hopefully, a better question.

8 Did you attempt to determine in this crash
9 what different parts of the vehicle impacted the road
10 and off the road between the end of the tire marks
11 that we see in 74 --

12 A. Uh-huh.

13 Q. -- Photo 74, all the way to the point of
14 rest, such that I could give you a vehicle and you
15 could say, "At this point this part touched. At this
16 point the next part touched," did you attempt to do
17 that in your investigation?

18 A. Well, I did to a certain degree. Now, on
19 my Accident Report I -- I think I put too many cars
20 in there. But I have a car in my -- I have a little
21 car in my patrol car that I use stuff like this for,
22 where I look at it and I try to draw it on how --
23 where I get the drawing right.

24 Q. Okay.

25 A. So I do that on all rollovers to make sure

1 that this is like that.

2 So looking at it, it does look like it --
3 it flips right here. But also there is gouge marks.
4 So I don't -- I interpreted that the flip initiated
5 right here and then went to there and then it flipped
6 over there. That's how I initiated it on the
7 vehicle.

8 Q. Okay. You didn't reconstruct this
9 accident, did you?

10 A. No, sir. No.

11 Q. Did you make any findings about speed?

12 A. No, sir.

13 Q. Did you make any findings about yaw rate?

14 A. No, sir.

15 Q. Did you make any findings about roll rate?

16 A. No, sir.

17 Q. Did you make any findings about yaw angle?

18 A. No, sir.

19 Q. Did you make any findings about the number
20 of rolls?

21 A. No, sir.

22 Q. Okay. That's what --

23 A. I put in there that it -- it turned over
24 three times. Now, when I put in the report it
25 flipped three times, I'm not talking about whole

1 flips. I'm talking about turn, turn, turn.

2 Q. Okay. But -- and again, I think I'm trying
3 to make sure that I'm not asking you to do more
4 than --

5 A. Oh, no.

6 Q. -- than you did. I mean, in order to
7 determine how many rolls, you have to take a close
8 look at the scratches on the vehicle?

9 A. Yes, sir. Uh-huh.

10 Q. And you have to take a close look at the
11 scratches at the scene?

12 A. Yes, sir.

13 Q. And it takes a lot of work to do that, even
14 after the day of the crash, hours and hours to
15 determine how the vehicle specifically moved. You
16 didn't attempt to do any of that, did you?

17 A. No, sir.

18 Q. All right. So if somebody asks you if you
19 have an opinion about how many times the vehicle
20 rolled, I'm assuming you would say, "I didn't
21 undertake that analysis;" is that fair?

22 A. Yes, sir.

23 Q. Okay. Then I can skip a whole bunch.

24 Obviously you've marked and certainly can
25 see the path of travel. But in terms of what

1 actually touched down where --

2 A. No, sir.

3 Q. -- you didn't attempt to undertake that
4 analysis?

5 A. No, sir.

6 Q. All right. Fair enough.

7 So let me just ask you a couple of things.
8 And let me start with Ms. Pollard.

9 What did you determine in terms of her
10 injury?

11 A. She was bleeding. Now, I don't know how.
12 I know she needed to be sewn up. Now, I can't
13 remember where her injury occurred. I know I got on
14 here upper -- upper body. But --

15 Q. Where are you pointing at in your report?

16 A. Right here.

17 Q. Okay. I gotcha.

18 A. Upper body. She was bleeding pretty bad
19 and needed stitches. Now, I cannot remember where
20 she needed it because when I watched the video and I
21 was explaining the ticket and I told her that she
22 needed -- they was talking about she needed to go to
23 the hospital. And I think I confirmed that. I told
24 her that she needed to get stitched up. But I don't
25 know where she was bleeding at.

1 Q. You don't know if it was on her head or on
2 her chest or on her arms?

3 A. I just know the upper part. If it was
4 head, we have a special port -- slot for head because
5 they said he had a head injury. So on his -- his
6 head.

7 Q. Okay.

8 A. So usually the upper would be from the
9 torso area.

10 Q. Okay.

11 A. So I would assume it had to be arm but I
12 don't know. I can't give you a hundred percent
13 answer where she was bleeding at.

14 Q. Gotcha.

15 Was she taken from the scene for treatment?

16 A. No, sir. She refused medical treatment.
17 She said she would -- I think her friend said she was
18 going to take her.

19 Q. Okay.

20 A. Yeah.

21 Q. Then let's switch to Mr. Ammerson.

22 What did you determine in your
23 investigation any observations about his injuries?

24 A. I just -- I think they just told me he had
25 a head injury. So I don't know the details. I

1 didn't do a follow-up.

2 Like I said, I didn't go to Grady.

3 Grady -- I didn't call Grady. Grady is a nightmare,
4 calling Grady to try and get some information. So --
5 and he wasn't the driver. So if something were to --
6 if he became deceased they would have notified us.

7 Q. Okay. Did you personally observe any
8 injuries to Mr. Ammerson?

9 A. No, sir. I never really got around him. I
10 just seen him being loaded up. And I don't even
11 think I even seen him go -- get into the helicopter.
12 I just seen the helicopter leave on my video. I was
13 actually in my patrol car when the helicopter left.

14 Q. Okay.

15 Having a rollover on the road like this and
16 the vehicle crashing into the road several times, is
17 that a severe crash?

18 A. I mean, any --

19 MR. PARRISH: Object to form.

20 A. -- anytime that a rollover crash occurs, I
21 mean, it's -- it's -- I would say it's a -- pretty
22 much nearly a severe crash.

23 Q. (By Mr. Boorman) Okay.

24 Do you know the outcome of the citation
25 that you gave to Ms. Pollard?

1 A. I never heard anything. Never got a
2 subpoena. So she had to pay it. And if she didn't
3 get a subpoena, then -- I mean, if she didn't pay it,
4 I would have got a subpoena to go to court. Or if
5 she requested a court date or a jury trial I would
6 have got another subpoena.

7 Q. Okay.

8 The weather on this day was clear at the
9 time of the crash?

10 A. It was -- at the time of the crash it was
11 clear. Now, it was cloudy but it was clear, like,
12 there was no road conditions.

13 Q. Okay.

14 A. Now, when I got there, you could see it
15 started raining bits and pieces of when I was there.
16 And then after that, it rained the whole rest of the
17 day.

18 Q. Okay. But at the time of the crash the
19 road, the surface of the road was dry?

20 A. Yes, sir.

21 Q. And it was -- the light condition was
22 daylight?

23 A. Yes, sir.

24 Q. Did you rule out any roadway factors
25 contributing to this crash?

1 A. There was no contributing factors.

2 Q. All right. And the road character at this
3 area, is it straight and level?

4 A. It was straight coming into it. Let me see
5 what I put on here.

6 I have straight and level here.

7 Q. Okay.

8 A. There's really -- I mean, that's what I put
9 on there. But there's really no straight and level
10 road here. One of them has a grade. But --

11 Q. Okay.

12 A. Yeah.

13 Q. Let me take a look at something.

14 Basically you ruled out the environment
15 having anything to do with this crash; is that
16 correct?

17 A. Yes, sir.

18 Q. And you ruled out the road having anything
19 to do with this crash; is that also true?

20 A. Yes, sir.

21 Q. All right.

22 For contributing circumstances for this
23 vehicle, what did you determine?

24 A. For what now?

25 Q. Under the vehicle, the Explorer, what was

1 your finding about contributing circumstances for
2 this vehicle?

3 A. Where do you see that at on the report?
4 Oh, contributing circumstances. That the area of
5 impact was on the top.

6 Q. Oh, I'm sorry. I'm looking at -- do you
7 see the area that -- the section of the report that
8 says "Contributing circumstances," one, open paren,
9 (this vehicle), close paren? It's right above --

10 MR. PARRISH: Object to the form.

11 A. It just says "None."

12 Q. (By Mr. Boorman) Okay.

13 A. Yeah.

14 Q. And explain what that means.

15 A. I would have to look at the drop-down box.
16 But I'm sure -- I mean, it's, like -- okay. So the
17 contributing circumstances, the most harmful event,
18 the first -- it's been a while since I looked at one
19 of these.

20 The first sequence is the noncollision,
21 which is the rollover. So that means that's not
22 another vehicle involved. The most harmful event was
23 the rollover. And the contributing circumstances, I
24 guess it was "none," meaning it was a one-vehicle
25 accident.

1 Q. Okay.

2 A. But like I said, I would have to -- I hate
3 that we don't have this report where I could bring
4 the computer in and just show you the drop-down box.

5 Q. Okay.

6 You investigated this crash on behalf of
7 the State of Georgia; is that correct?

8 A. Yes, sir.

9 Q. And is it true that what we've marked as
10 Exhibit A is an official copy of your findings of
11 your investigation?

12 A. Yes, sir.

13 Q. All right. With respect to the findings
14 related to Ms. Pollard, what did you find with
15 respect to whether there were any driver vision
16 obstructions?

17 A. There was no -- vision was not obscured,
18 meaning, like, there was nothing blocking the
19 roadway. There was no sun coming into her eyes.
20 There was no bushes or trees causing her to not be
21 able to see.

22 Q. Okay. And in terms of driver actions at
23 the time of the crash, based upon your investigation
24 what did you find?

25 A. No contributing action. Is that right?

1 The driver's action at the time of the crash. Oh, I
2 looked at three. One, ran off roadway.

3 Q. Okay.

4 A. And two, failed to keep proper lane.

5 Q. Okay.

6 Let me take a look at one of the -- sorry.
7 I have to dig around for this.

8 If you can look at Photo 79 and the
9 driver's side rear tire. Is that photo good enough
10 that you can look at the tread of that tire?

11 A. I mean, compared to the other tires, it
12 looks more bald on it.

13 Q. Okay. And I'm going to hand you what's
14 been marked as Exhibit 9.

15 (Defendant's Exhibit 9, Ga. Code Ann.,
16 40-8-74, Effective July 1, 2011, marked for
17 identification.)

18 Q. (By Mr. Boorman) Which is a code section
19 you may be familiar with or you may not be. It's
20 Georgia Code 40-8-74. And are you familiar with that
21 code section that says "Tires shall not have less
22 than 2/32nds of an inch of tread"? Are you familiar
23 with that?

24 A. I'm familiar with it. I never wrote a
25 citation on it but I'm familiar with it.

1 Q. All right. You may know, you may not know.
2 Do you know if that tire that we see, the back side
3 driver's tire had less than 2/32nds?

4 A. I didn't -- I didn't pay -- I didn't do --
5 I didn't investigate that.

6 Q. Understood.
7 If a tire does have less than that, it is a
8 violation of this code section, correct?

9 A. Yes, sir.

10 Q. All right.
11 And after your investigation of this crash,
12 including talking to Ms. Pollard, looking at the
13 scene, marking the scene evidence, was it your
14 finding that she was the sole cause of this crash?

15 A. Yes, sir.

16 MR. PARRISH: Object to form.

17 MR. BOORMAN: Okay. Thank you very much
18 for your time, Trooper. I may have some
19 follow-ups --

20 THE WITNESS: Okay.

21 MR. BOORMAN: But I believe the other
22 attorney may have some questions. I'll try to
23 clean up my junk because I've made quite a mess.

24 EXAMINATION

25 BY MR. PARRISH:

1 Q. I'm just going to have a few questions for
2 you.

3 Based on the report that you filled out,
4 what was it, about 11 minutes from the time of the
5 wreck until you arrived on the scene?

6 A. Ten or 11 minutes, yes, sir.

7 Q. Okay.

8 A. Yeah, 11 minutes.

9 Q. All right.

10 Did you personally observe them cutting the
11 pillars of the vehicle or any parts of the vehicle
12 such that you can tell us with any certainty exactly
13 what was cut versus what wasn't cut as you sit here
14 today?

15 A. No, sir. Like I told him, they was cutting
16 when I got there. But I didn't -- I feel like I
17 would be in the way. I do not go near the scene when
18 they're doing that.

19 Q. All right. So you don't know exactly what
20 was cut on the car?

21 A. No, sir.

22 Q. Is there any evidence that alcohol or drugs
23 contributed in any way to the wreck or Mr. Ammerson's
24 injuries?

25 A. No, sir.

1 Q. Based on the investigation that you did at
2 the time and the markings that you observed on the
3 roadway and off the roadway, I think you told us that
4 at the time you determined that it was three quarter
5 turns?

6 MR. BOORMAN: I'm sorry. Object to the
7 form and foundation.

8 I just need to state that for the record
9 but please answer.

10 A. Yes, I believe it was three flips. Not --
11 not full flips, just three flips.

12 Q. (By Mr. Parrish) So, like, quarter turns?

13 A. Yes, sir.

14 Q. Okay. So if the vehicle is upright, one
15 turn would be over on to the side, two turns would be
16 over on to the roof, another turn would be over on to
17 the other side. So first turn would be on to the,
18 let's say, the driver's side?

19 A. Side.

20 Can I use this?

21 MR. BOORMAN: Absolutely. Yeah.

22 A. Yeah. So I had her turning.

23 Q. (By Mr. Parrish) Oversteering? The vehicle
24 is oversteering?

25 A. Yep. And then -- and then --

1 Q. Okay.

2 MR. BOORMAN: And object to the form.

3 But go ahead.

4 THE WITNESS: Okay.

5 Q. (By Mr. Parrish) So the driver's side hits
6 first, then the roof and then the passenger side?

7 A. Yes.

8 Q. Comes to rest on the passenger side?

9 A. Yes, sir.

10 Q. All right.

11 A. That's how I -- I believe it happened.

12 Q. All right.

13 If we look at Photo 74. And there are two
14 dots. There's a line of two dots there. Are those
15 markings for the left side tires? So the driver's
16 side tires?

17 A. Number 74, yeah. Is there 73?

18 Yes, that's the left side. That's the left
19 side driver's.

20 Q. Okay. And then just a little bit beyond
21 that, there are -- I think you described those as
22 gouge marks?

23 A. Yes, sir.

24 Q. All right. And is that likely from the
25 wheels of the vehicle?

1 A. Yes, sir.

2 MR. BOORMAN: Object to the form.

3 Speculation.

4 But go ahead.

5 A. Yeah. Usually, like I was telling them,
6 gouge marks comes from the tires of the rims or when
7 it turns and scrapes on to the roadway.

8 Q. (By Mr. Parrish) Okay. And in your
9 opinion, where those markings are -- and there are
10 two orange markings adjacent to the gouge marks?

11 A. Yes, sir.

12 Q. Is that where the vehicle started to roll?

13 A. Looking at it like this, I believe it does
14 roll right here just because the other day when I was
15 looking at it I didn't realize how big a gap this
16 was. Usually when you have that big of a gap that's
17 when it starts to roll.

18 Sometimes when the vehicle turns completely
19 like this and the tires before it -- you know how the
20 tires go against the course causes gouges and then it
21 flips. As big as a space that is, I think it's
22 overturning there and that's the sliding.

23 Q. Okay. All right.

24 And you said that you looked at it the
25 other day. Did you look at these photos sometime in

1 the past week?

2 A. Yes, sir.

3 Q. Okay. Where did you do that at?

4 A. Here.

5 Q. Okay. And "here," is this the building,
6 999 Peachtree Street, Northeast?

7 A. Yes.

8 Q. Okay. And whose office were you in when
9 you looked at them?

10 A. Downstairs in the, I guess, the main --

11 Q. Was it the law firm of Huff Powell &
12 Bailey?

13 A. Yes, sir.

14 Q. Counsel for Ford Motor Company?

15 A. Yes, sir.

16 Q. Okay. I think you mentioned to me when we
17 spoke that there's some point on here where you
18 believe that two -- two wheels were down and in
19 contact with the pavement?

20 A. Off the road?

21 Q. Sure. Yeah. When it was rolling, when the
22 vehicle was sliding?

23 A. Oh, that's what I was explaining. Gouge
24 marks.

25 Q. Uh-huh.

1 A. Yeah. But that's a big space for it to
2 have nothing there. So I truly -- that's where it
3 overturned and that's where it was sliding causing
4 the marks.

5 Q. Okay. So right where the gouge marks
6 are --

7 A. Yes, sir.

8 Q. -- that's where it was rolling?

9 A. Yes, sir.

10 Q. I know that you didn't determine speed with
11 precision. But the speed that you believe she was
12 traveling at would not have warranted a speeding
13 ticket on this road?

14 A. No -- no, sir. And I didn't -- I didn't do
15 speed, just like I told y'all earlier. But I don't
16 believe she was going fast enough for me, if I would
17 have seen her coming, to write her a citation.

18 Q. Okay.

19 Now, after you spoke with Ford Motor
20 Company or their representatives last week, did you
21 consult with or speak with someone on the SCRT Team
22 about the photographic evidence?

23 A. Yes, sir.

24 Q. Okay. What did you speak with the SCRT
25 Team member about?

1 A. Because I -- I knew this was two tires.
2 This is the front tire and the back tire and the back
3 tires coming. That's Page 73.

4 Q. Okay.

5 A. And just for validation, I took a picture
6 and sent it to a SCRT guy and they confirmed that it
7 was two tires.

8 Q. Depicted in 73?

9 A. In Picture 73.

10 Q. Okay. And did Ford's representatives
11 convey to you that they believed it was only one?

12 A. No, sir.

13 Q. Okay. Did they suggest that?

14 A. No, sir.

15 Q. Okay.

16 At the time of the collision you did not
17 measure the tread depth, did you?

18 A. No, sir.

19 Q. Did anyone suggest that the tread depth of
20 the tires played a role in this?

21 A. No, sir.

22 Q. And if they had, if the tires or the
23 condition of the tires played a role in this
24 collision, is that something that you probably would
25 have picked up on during your investigation?

1 A. I mean, I would have noted it in the
2 Accident Report. I just didn't look at the tires.
3 And even if I did look at the tires, it's nothing
4 that I would have wrote a citation for.

5 Q. And the pavement was dry at the time?

6 A. At the time of the accident, yes, sir.

7 Q. And do you know a tire that's -- has less
8 tread on it and more contact patch, does that have
9 more or less traction on dry pavement?

10 A. The tire with less traction?

11 Q. Less tread.

12 A. Less tread on dry pavement?

13 Q. Yeah. And more contact patch. So more
14 rubber is contacting the pavement.

15 A. So have more -- what was --

16 Q. My question is, do you know whether that
17 would have more or less traction?

18 A. I don't know. I don't want to say what I
19 don't know.

20 Q. Do you agree that there's no one definition
21 of overcorrection?

22 A. No, sir. I mean, there's no --

23 Q. Do you agree with that, that there's no one
24 definition --

25 A. Oh, yes.

1 Q. -- of overcorrection.

2 MR. BOORMAN: Objection to the form.

3 Vague.

4 Q. (By Mr. Parrish) It's a subjective term,
5 isn't it?

6 A. Yes.

7 MR. BOORMAN: Same objection.

8 Q. (By Mr. Parrish) Do you have any reason to
9 believe that Ms. Pollard, Cindy Pollard or now Cindy
10 Cosper, do you have any reason to believe that she
11 turned the wheel any more than she thought she needed
12 to at any given time?

13 MR. BOORMAN: Hold on a second.

14 Object to the form. Calls for speculation
15 of another person.

16 But answer if you can.

17 A. I mean, I can't -- I can't -- I mean, I
18 really -- I can't answer that question because I'm
19 not driving with her or --

20 Q. (By Mr. Parrish) Well, I guess just the
21 question is, is there any reason that you would
22 believe that she turned the wheel more than she
23 thought was necessary at the time?

24 MR. BOORMAN: Same objection.

25 A. There's -- a lot of it depends on their

1 driving skills. I mean, some people can run off the
2 road and get it back under control. Some people
3 don't have -- they -- they freak out more. And
4 that's -- and they overcorrect and they overcorrect
5 too much and that causes the vehicle to lose control.

6 Q. (By Mr. Parrish) Well, I guess what I'm
7 asking is, do you have any evidence that you can
8 point to that she turned the wheel more than she
9 thought was necessary?

10 A. No, sir.

11 MR. BOORMAN: Same objection.

12 Q. (By Mr. Parrish) And different vehicles
13 have different handling characteristics; that's true
14 too, isn't it?

15 A. Yes, sir.

16 Q. You're not an expert in vehicle dynamics,
17 that's true?

18 A. No, sir.

19 Q. You don't know how much the wheel was
20 turned at any one given time?

21 A. No, sir.

22 Q. And there's no way that you can calculate
23 the degree that the wheel was turned in at any one
24 given time?

25 A. No, sir.

1 Q. Would you defer to engineers who can make
2 those calculations?

3 A. Yes, sir. They have a black box in most
4 vehicles. I don't know if this one has it. But it
5 tells you pretty much everything you didn't know
6 about what -- that's how a lot of the SCRT Teams,
7 they get that black box just to confirm everything
8 they -- they seen on the road.

9 But I don't know if this one had it. And I
10 didn't -- and I didn't pull it. So -- and I didn't
11 get a SCRT Team to pull it. So --

12 Q. If Ms. Cosper wants -- in the emergency
13 situation, if she turned the wheel the amount that
14 she thought was necessary, you wouldn't blame her for
15 that, would you.

16 MR. BOORMAN: Same objection. Speculation
17 and vague.

18 A. Regardless, it would still be her fault in
19 the accident because she lost control regardless of
20 how much she turned the wheel.

21 Q. (By Mr. Parrish) Understood.

22 But you wouldn't fault her for turning it
23 and trying to correct an emergency situation if she
24 did the best she could and turned it what she thought
25 was the appropriate amount?

1 MR. BOORMAN: Same objection. And he just
2 answered that question.

3 A. I mean --

4 MR. BOORMAN: You don't have to give a
5 different answer.

6 A. I mean, that's -- I mean, it's the same.
7 So, I mean, I -- I don't -- I don't know what answer
8 you want me -- I don't -- she -- she lost control
9 regardless if she overcorrected or not. She ran off
10 the road and then she overcorrected again.

11 So I don't know how you can say it's not
12 fault of her when it's her fault.

13 Q. Okay. And that's simply because of the
14 fact that she went on to the other side of the road
15 and the vehicle overturned, right?

16 A. Yes. She couldn't maintain her lane and
17 then she overcorrect and that's when she lost
18 control.

19 Q. Right. But all you know in terms of the
20 sequence, you know, and the amount that she turned
21 the wheel --

22 A. Yeah, I don't -- I don't know --

23 Q. What she's thinking at the time?

24 A. I don't know.

25 Q. Let me start over.

1 In terms of the sequence of events and the
2 way that she turned the wheel, how much she turned
3 the wheel, the facts that you know are that there was
4 an emergency situation, there was a turning maneuver
5 during the emergency situation and she lost control
6 of the vehicle; is that true?

7 MR. BOORMAN: Object to the form.

8 Misstates prior testimony.

9 But answer if you can.

10 A. I mean -- I mean, it's true. I mean, she
11 lost control of the vehicle by her vehicle maneuver.

12 Q. (By Mr. Parrish) Okay.

13 A. So, I mean, I don't -- I don't know how you
14 want me to answer the question. I mean, she, like I
15 said, she ran off the road. She tried to
16 overcorrect. She went too far. She overcorrected
17 again. That's when she lost more control.

18 Q. And when you say "overcorrected," what I'm
19 getting at is you don't know how much --

20 A. I don't know the amount she turned the
21 wheel, no, sir.

22 Q. Okay. And so there was an emergency
23 situation. There was a turning maneuver within the
24 emergency situation. And what do we call that?
25 You're saying overcorrecting. Is that called

1 oversteering when the vehicle turns?

2 A. You can call it that.

3 MR. BOORMAN: Hold on a second. I'm sorry.

4 Objection. Narrative. Complex question.

5 Misstates prior testimony.

6 But answer if you can.

7 Q. (By Mr. Parrish) What's it called when the
8 vehicle's back end slides out in a turn? In other
9 words, let's say it's a right turn and the vehicle --
10 the front wheels are going to the right and the back
11 wheels are sliding out to the left. Is that called
12 oversteering?

13 A. Well, I mean, it's rotation. It's a
14 clockwise rotation in the -- in the vehicle.

15 Q. (By Mr. Parrish) All right.

16 A. Yeah.

17 Q. And so here in this collision, this wreck,
18 the vehicle oversteered, right, when it was coming
19 back from the other side of the road when that
20 clockwise rotation -- would that you call
21 oversteering?

22 A. That's a yaw mark where they're losing
23 control in the vehicle.

24 Q. Okay. Are you not familiar with the term
25 "oversteering"?

1 A. I mean, we call it overcorrecting. It's
2 where they overcorrected and it caused a yaw mark.
3 That's how we write the reports up.

4 Q. Okay.

5 A. And then usually that's when the wrecks
6 happen.

7 Q. Okay. So you do not use the term --

8 A. I don't use "oversteer." I always use
9 "overcorrected."

10 Q. Okay. So you would never put in a report
11 "oversteering"?

12 A. No, sir. No, sir.

13 Q. Okay. You would always use
14 "overcorrecting"?

15 A. Yes, sir.

16 Q. Okay.

17 A. And every one of my reports in a similar
18 wreck like this I always use "overcorrected." And
19 then I always put what the driver states.

20 Q. Okay. Have you ever heard the expression
21 "understeering, oversteering"?

22 A. I've heard that, yes. But I've just always
23 used "overcorrected."

24 Q. Okay.

25 A. That's just how I was trained.

1 Q. You cannot say whether the vehicle played a
2 role or what role it played in the rollover?

3 A. No, sir.

4 MR. BOORMAN: Object to the form.

5 But go ahead and answer.

6 A. No, sir.

7 Q. (By Mr. Parrish) All right. And that's a
8 question for engineers, correct?

9 A. Yeah. I don't -- yeah. I don't have no
10 information. I'm not certified for that.

11 Q. Okay. All right.

12 MR. PARRISH: I don't think I have anything
13 else.

14 MR. BOORMAN: Sir, you have the opportunity
15 to read and sign this deposition to make any
16 typographical corrections, spelling corrections,
17 those sort of things. Or you can waive
18 signature and just trust the court reporter got
19 everything written down correctly.

20 Do you have a preference on those?

21 THE WITNESS: No. I mean, everything is --
22 everything is -- I believe is correct on here.

23 MR. BOORMAN: Okay. So you're going to
24 waive signature.

25 THE WITNESS: Yes.

1 MR. BOORMAN: All right. Just give me two
2 minutes. We're going to take a break.

3 THE WITNESS: Okay.

4 MR. BOORMAN: And then I'll come right
5 back. But I think we're -- we are timing up
6 about perfect. You've got five minutes left.

7 (WHEREUPON, a recess was taken.)

8 EXAMINATION

9 BY MR. BOORMAN:

10 Q. All right. As a result of your work in
11 this case, including your interview of Ms. Pollard,
12 your documenting all the scene evidence, your
13 finding, based upon your investigation, is that this
14 rollover occurred because Ms. Pollard was thinking of
15 other things, failed to maintain her lane and
16 overcorrected this Explorer twice; is that true?

17 MR. PARRISH: Object to form.

18 A. Yes.

19 MR. BOORMAN: Okay. All right. That's all
20 I had.

21 Anything else or --

22 MR. PARRISH: No.

23 MR. BOORMAN: All right. All right.

24 Deposition is concluded.

25 (WHEREUPON, the deposition was concluded at

12:02 p.m.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

C E R T I F I C A T E

STATE OF GEORGIA)

) ss.:

FULTON COUNTY)

I, Robin Ferrill, Certified Court Reporter
within the State of Georgia, do hereby certify:

That TROOPER JOEY WILSON, the witness whose
deposition is hereinbefore set forth, was duly sworn
by me and that such deposition is a true record of
the testimony given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage; and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 11th day of November, 2019.



ROBIN K. FERRILL, RPR

[& - allowed]

Page 1

&	2007 23:17	40-8-74 3:22 78:16	950 2:10
& 84:11	2008 23:17	78:20	96 3:6
0	2009 9:4	404.891.0141 2:5	999 1:16 2:10 84:6
00189 1:6	2011 3:23 78:16	404.892.4022 2:11	a
05 22:5 35:21	2012 26:11 27:1	4705 2:16	a.m. 1:14
06 25:25	2014 24:7 26:12	4:58 37:13	able 16:6 77:21
09 26:1,3 27:1	2015 37:2	5	absolutely 81:21
1	2016 14:18 26:24 35:15	5 3:16 10:25 11:3	accident 8:18
1 3:10,23 6:16,19 22:19 78:16	2017 9:7	500 28:20	11:18,19 23:15
10 3:16 9:4 31:7	2018 9:7 26:24 52:2	52 8:8,8 9:12,13	24:15,21 28:11
100 2:17	2019 1:13 3:4 4:3 98:17	5:10 41:22 42:3	33:7 44:12,24
10:10 1:14	21 22:4	6	46:10,11 66:23
11 80:4,6,8	2250 2:3	6 3:10,18 12:3,7,7 12:21	67:7,9 68:19 69:9
11th 98:17	25 15:11	600 28:25	76:25 87:2,6
12 3:18 27:4	2500 29:1,8,24	7	90:19
12:02 97:1	25th 11:11,12 37:2	7 3:11,12,14,19 15:2,4	accidents 11:15
13637 98:19	28 1:17	71 61:9 62:2 63:7	23:18 29:11,11
15 3:19,20	29 1:13 3:4 4:3	72116 2:17	accurate 15:19
16 27:4,9 31:3	2:18 1:6	73 63:1,16 64:4 82:17 86:3,8,9	accurately 12:14
18 27:9,12	3	74 64:2 65:6,15,25 68:11,13 82:13,17	accusation 3:17
18th 22:11	3 3:12 7:16,19 22:19 23:2 24:25 25:3	75 65:9	11:1
1936 1:20	30 13:6,7,9 40:22 52:14	78 3:22	action 1:5 77:25
1:30 39:9	300 28:22	79 3:7 53:22 78:8	78:1 98:13
1:50 39:18	30309-4514 2:11	8	actions 77:22
1:57 39:15 40:19	30326-2900 2:4	8 3:20 15:23 16:2 16:4 17:10	actual 13:24 14:3
1st 22:6	32 45:14	80 54:3	15:8 16:15 48:17
2	33 45:16	81 53:23 55:6 60:18	additional 6:23
2 3:11 7:3,7 8:21 10:7 22:19	35 37:21	82i 60:9	49:8
2,000 28:21 29:1,8	36 9:24	9	adjacent 83:10
2/32nds 78:22 79:3	3:34 37:5	9 3:22 78:14,15	admitted 63:20
20 14:18 32:25	3:45 37:11	94 35:23	agencies 25:20
2000 34:24 36:1 38:16	4	945 2:4	ago 50:4
2002 21:10,15	4 3:6,14 7:24 8:3		agree 87:20,23
2006 9:1 22:7,11 23:11,12 25:7			agreement 4:6
			ahead 82:3 83:4 95:5
			airborne 65:7
			alco 33:24 34:9
			alcohol 80:22
			allowed 49:11

[allyn - broke]

Page 2

allyn 2:9 alternate 11:23 ammerson 3:15 7:25 8:3 12:9 39:5 43:22 46:6 47:25 48:14 50:11 52:23 58:18 61:1 72:21 73:8 ammerson's 80:23 amount 90:13,25 91:20 92:20 analysis 70:21 71:4 angle 69:17 ann 3:22 78:15 answer 4:15 6:1 72:13 81:9 88:16 88:18 91:5,7 92:9 92:14 93:6 95:5 answered 91:2 anybody 11:16 13:7 18:19 31:12 50:7 51:23 52:18 anybody's 50:8 anyplace 16:3 anytime 73:20 apiece 28:22 apologize 20:22 53:10 apparently 16:19 appearances 2:1 approaching 40:23 appropriate 90:25 approximately 37:5 april 26:1,3 area 27:23 37:25 59:23 62:18 72:9 75:3 76:4,7	arkansas 2:17 arm 72:11 arms 72:2 arrive 37:10 arrived 80:5 asked 41:11,12,16 41:18 52:14 63:23 asking 14:7 57:2 70:3 89:7 asks 70:18 assist 25:19 associates 2:16 assume 72:11 assumed 57:18 assuming 70:20 atlanta 1:18 2:4,11 45:6,11 attach 15:8 attached 3:24 attempt 24:20 68:8,16 70:16 71:3 attorney 79:22 audible 6:1 audio 41:1 51:2 august 22:11 25:25 auto 34:12 avenue 2:16 aware 12:17 20:12 20:13 33:21 51:3	93:8,10,19 96:5 backboard 56:23 backed 47:8 background 6:11 20:25 21:6 23:19 42:6 bad 68:5 71:18 bagging 34:19 bags 54:7 bailey 2:10 84:12 bald 78:12 based 44:25 77:23 80:3 81:1 96:13 basically 30:10 39:10 41:23 59:5 75:14 begins 66:4 behalf 2:2,8,15 50:11 77:6 believe 7:20 32:17 38:23 54:9 55:24 79:21 81:10 82:11 83:13 84:18 85:11 85:16 88:9,10,22 95:22 believed 86:11 belt 43:6,7 59:12 best 7:14 14:10 16:19 28:18,20 29:7 90:24 better 25:6 68:7 beyond 82:20 big 56:11,20,20 83:15,16,21 85:1 birth 9:8 bit 6:12 14:1 17:21 25:5 41:2,5 47:6 47:11 60:5 61:18 82:20 bits 74:15	black 90:3,7 blackburn 2:9 blame 90:14 bleeding 71:11,18 71:25 72:13 blocking 77:18 blood 98:13 blow 33:24 34:9 body 71:14,18 boorman 2:8 3:6 4:4,17,21,23 6:18 7:6,19 8:2 11:3 12:5 15:6 16:1 32:4 40:21 42:1 49:17 63:14 65:10 67:3,5,6,19 73:23 76:12 78:18 79:17 79:21 81:6,21 82:2 83:2 88:2,7 88:13,24 89:11 90:16 91:1,4 92:7 93:3 95:4,14,23 96:1,4,9,19,23 bottles 54:7 60:17 bottom 12:8,9 53:22 box 8:17 9:10 49:2 76:15 77:4 90:3,7 brag 28:18 break 5:12,15 36:20 53:17 57:12 96:2 breath 27:17,17 bremen 41:9 brief 21:6 bring 51:13 77:3 bringing 27:21 brings 22:5 broke 31:9 57:18 57:19
	b		
	b 1:20 56:11,14 57:12 back 9:6 20:8 39:8 44:4 46:2,10 47:7 47:11,22,23 49:14 49:22,24 53:14 55:12,21 57:19 61:17 62:6 64:11 79:2 86:2,2 89:2		

[broken - considered]

Page 3

broken 57:13 brown 2:9 bud 54:10 60:19 building 84:5 bunch 19:15,17,22 70:23 bushes 77:20 busiest 25:12 buycrash 16:6	cartersville 26:13 27:8 47:2,3 case 5:4 6:21 11:23 12:10 16:20 24:18 32:13 45:10 48:12 67:11 96:11 cases 33:7 cause 79:14 caused 62:22 63:10 94:2 causes 83:20 89:5 causing 77:20 85:3 ccr 1:20 cedartown 26:4,6 26:10 27:2 center 45:11 ceo 21:22 certain 20:3 22:23 32:11 68:18 certainly 66:12 70:24 certainty 80:12 certified 95:10 98:6 certify 27:16 98:7 98:12 chance 12:13 36:10 changed 9:19,23 changing 48:23 character 75:2 characteristics 89:13 check 37:9 49:2 checkups 51:16 chest 72:2 christmas 37:2 42:13 cindy 1:4 3:13 7:17 11:12 38:18 38:19,23 46:7	58:6,24 88:9,9 circumstances 75:22 76:1,4,8,17 76:23 citation 11:4,10,13 11:17,19 46:12,13 73:24 78:25 85:17 87:4 citations 3:16 11:1 civil 1:5 class 23:20 24:25 classes 22:23,23 23:23 classified 25:4 clayton 27:23 clean 79:23 clear 58:5,16 74:8 74:11,11 click 9:9 clip 42:2 43:9 clockwise 64:9,13 93:14,20 close 61:3,5 70:7 70:10 76:9 closed 26:10 clothes 54:7 cloudy 74:11 club 1:15 code 3:22 7:15,20 8:6,11 10:4 78:15 78:18,20,21 79:8 codes 7:14,21 9:3 9:9,10 16:17 coffee 55:15,19 collision 86:16,24 93:17 color 3:18 12:3 coma 48:22 come 8:12 10:10 44:20 48:20,25 96:4	comes 13:20 19:10 82:8 83:6 coming 33:4 45:4 48:9 59:1 64:11 75:4 77:19 85:17 86:3 93:18 command 26:19 27:14 comment 39:13 communicate 51:9 communications 21:22,23 company 1:7 84:14 85:20 compared 78:11 complete 24:5 28:4 completed 18:23 23:7 24:8 completely 29:20 56:8 83:18 complex 93:4 computer 77:4 computers 46:1 conclude 63:8 64:13 concluded 96:24 96:25 conclusion 66:5,6 condition 36:13 74:21 86:23 conditions 74:12 confirm 4:20 90:7 confirmed 71:23 86:6 confirming 37:8 confusing 5:17 consent 26:20 consider 13:8 considered 65:22
c			
c 26:19 27:14 98:1 98:1 cabin 35:19 calculate 89:22 calculations 90:2 call 5:13 42:15 46:11 48:5 51:17 73:3 92:24 93:2 93:20 94:1 called 4:10 14:11 21:22 48:1 92:25 93:7,11 calling 14:14 73:4 calls 88:14 camera 12:23,25 13:1,10 14:4,5,15 capitol 26:23 27:10 52:1 car 3:19 14:24 15:3,4,18 17:17 20:8 31:17 34:21 39:11,18 43:5 45:12 46:1 68:20 68:21,21 73:13 80:20 card 46:1 cargo 59:23 carrying 55:21 cars 25:17 30:8 32:1 68:19			

construction 28:11 consult 85:21 contact 84:19 87:8 87:13 contacting 87:14 contributed 80:23 contributing 74:25 75:1,22 76:1,4,8,17,23 77:25 control 41:21 63:25 89:2,5 90:19 91:8,18 92:5,11,17 93:23 conversation 5:23 41:5 42:2 50:12 convey 86:11 copies 3:18 12:3 12:24 13:3 16:11 copy 3:19 7:8 15:2 15:4 16:5 17:13 46:10 77:10 cords 54:15 core 35:17 corinth 37:16 corner 12:8 correct 17:11 24:25 37:1 41:9 64:4 75:16 77:7 79:8 90:23 95:8 95:22 corrections 95:16 95:16 correctly 23:4 95:19 cosper 1:4 3:13 7:17,22 38:23 40:17 41:6 88:10 90:12	counsel 2:1 4:6 84:14 counties 27:23 country 38:13 county 13:22 21:9 37:17 39:22 40:11 98:4 couple 16:11 30:3 36:8 53:9 55:13 71:7 course 35:18 83:20 courses 21:1 23:4 23:8 28:12 29:12 court 1:1 6:2 46:13 74:4,5 95:18 98:6 covered 28:3 crash 3:11,12,14 3:20 6:13 7:4,8,17 7:25 8:17 12:15 12:18 13:24 14:23 15:19,20,24 16:5 16:11,14,15,16 17:13,20,21,22 18:20 19:1 20:15 24:9 25:15 26:7 26:14 28:13 30:20 34:24 36:2,6,14,24 37:1,4,16,20 38:2 38:3 42:11,24 43:2,4 44:13 45:3 47:5 49:5,21 50:20 51:5,8,23,24 52:13,22 53:7 55:25 57:14 60:15 68:8 70:14 73:17 73:20,22 74:9,10 74:18,25 75:15,19 77:6,23 78:1 79:11,14	crashes 7:11 28:19 29:24 32:23 36:6 38:1 crashing 73:16 cross 63:10 crying 43:10,13 cs3577058 1:25 currently 35:10 curve 62:5,6,9 curvy 38:7 cut 13:22 43:5,7 56:6,8,10,16 57:3 57:19,25 59:13 80:13,13,20 cutting 44:3 57:6,7 57:23 58:2,3 80:10,15 cv 1:6 cws 1:6	decide 15:7 defective 33:12 defendant 1:8 2:8 2:15 defendant's 3:9 6:16 7:3,16,24 10:25 12:3 15:4 15:23 78:15 defer 66:22 67:6 67:12 90:1 definition 87:20 87:24 degree 68:18 89:23 dekalb 27:23 deleted 14:21 department 20:1 40:12 59:24 60:12 department's 19:20 54:16 depend 44:25 depends 45:2 88:25 depict 12:14 depicted 86:8 depiction 15:19 deposition 1:11 3:2 4:1,5,16 5:2 6:19 95:15 96:24 96:25 98:9,10 depositions 5:9 32:17 depth 86:17,19 deputy 39:22 40:10 described 82:21 description 3:8 details 11:24 72:25 determination 66:2
		d	
		dad 43:5 damage 11:16 47:17 damon 2:15,18 date 9:8 11:8 74:5 day 14:23 41:8 42:13 49:4 51:5,8 70:14 74:8,17 83:14,25 98:17 daylight 74:22 days 13:6,7,9 dbrown 2:12 dealing 16:10 debris 54:4 55:9 55:23 60:13 deceased 13:7 73:6 december 11:11 11:12 14:18 26:22 27:12 37:2	

[determine - fair]

Page 5

determine 61:1 68:8 70:7,15 71:9 72:22 75:23 85:10 determined 81:4 die 13:7 died 47:25 48:15 51:12 different 16:11 27:22 44:15,16,17 47:3 48:4 65:12 68:9 89:12,13 91:5 differently 31:25 dig 78:7 digging 65:18 digital 14:11 direction 41:9 discussed 53:6 distance 58:19 district 1:1 division 1:1,2 26:20 document 46:17 46:19 documentation 40:5,6 documenting 24:19 96:12 documents 6:22 20:14 doing 17:2 25:23 26:9 27:5,9,15 29:20 58:13,20 80:18 dots 47:15 82:14 82:14 double 37:9 63:10 downstairs 84:10 draw 68:22 drawing 68:23	drink 5:14 drinking 41:11 48:7 61:2 drive 15:8 35:8,18 45:11 driven 31:15,20 34:25 driver 11:17 20:8 30:14 38:16 44:9 48:6 58:6 61:8 73:5 77:15,22 94:19 driver's 46:9 56:6 56:11 57:4,11,12 63:3,4,10 64:6 78:1,9 79:3 81:18 82:5,15,19 drivers 18:1 64:18 64:18,19 driving 88:19 89:1 drop 8:17 9:9 76:15 77:4 dropped 62:10 drugs 80:22 dry 74:19 87:5,9 87:12 dui 33:7,23 duis 32:23 duly 4:10 98:9 duties 24:16 25:6 25:10 dwayne 2:9 dynamics 89:16	edwin 5:1 effective 3:22 78:16 effort 68:1 either 6:10 9:17,20 51:1 52:22,23 emergency 90:12 90:23 92:4,5,22,24 enforce 25:11,19 26:7,15 enforcement 21:23 28:6 enforcing 26:25 engineers 90:1 95:8 entrekin 40:9 environment 75:14 equipment 56:4 60:11 esquire 2:2,8,9,15 estimate 28:19,20 29:7,25 61:21 estimating 29:23 event 76:17,22 events 92:1 everybody's 44:19 evidence 19:25 79:13 80:22 85:22 89:7 96:12 exactly 40:7 42:3 64:23 80:12,19 examination 3:5 4:22 79:24 96:8 examined 4:11 exhibit 3:9,10,11 3:12,14,16,18,19 3:20,22 6:16,19 7:3,7,16,19,24 8:3 8:21 10:7,25 11:3 12:3,7,7,21 15:2,4	15:23 16:2,4 17:10 77:10 78:14 78:15 exhibits 3:8,24 exist 6:11 experienced 30:13 expert 32:15 33:3 33:9 89:16 experts 32:11,12 66:22 67:11 explain 9:24 46:10 46:12 76:14 explaining 10:6 43:12 51:2 71:21 84:23 explanation 8:12 explorer 34:25,25 35:1 36:1,13 38:17 51:6 53:25 55:12,25 56:4 58:18 61:11,22,25 63:15 65:7 66:3 66:24 75:25 96:16 expression 94:20 extraction 54:17 extrication 56:3 eyes 41:14 77:19 eyewitnesses 51:10
			f
			f 98:1 fact 28:10 91:14 factors 74:24 75:1 facts 92:3 fail 11:18 failed 9:22 78:4 96:15 failure 9:25 10:3 11:20 fair 15:19 59:19 70:21 71:6

[familiar - graduated]

Page 6

familiar 12:6 37:19 78:19,20,22 78:24,25 93:24 families 53:3 family 19:2 48:4 48:10,11 far 92:16 fast 46:7 85:16 faster 38:14 42:20 fatality 13:8 48:19 49:1 51:14 father 46:8 48:8 fault 90:18,22 91:12,12 federal 4:7 feel 7:10 80:16 feet 61:22 ferrill 1:20 98:6,20 ferry 2:4 field 27:20 29:11 fifteen 32:25 figure 59:15 file 6:10,20 15:8 files 14:11,11 filled 8:21 11:9 16:13 80:3 final 66:10 find 14:13 47:9 62:22 77:14,24 finding 65:23 76:1 79:14 96:13 findings 69:11,13 69:15,17,19 77:10 77:13 fine 4:17 finger 13:22 fire 19:19 40:11 41:3 54:16 57:8 59:24 60:12 firm 2:3 84:11	first 4:16 6:18 9:1 21:6,18 24:25 25:7 31:17 43:19 43:21 59:17 61:14 76:18,20 81:17 82:6 five 96:6 flag 47:23 flags 47:14,23 61:10 flight 13:23 46:6 flip 36:10 69:4 flipped 30:20 69:5 69:25 flips 69:3 70:1 81:10,11,11 83:21 focus 57:10 58:7 61:8 folks 32:8 follow 73:1 79:19 follows 4:12 ford 1:7 34:24,25 35:1 36:1 84:14 85:19 ford's 86:10 forgot 30:22 form 4:14 32:2 63:13 65:8 67:1 67:15 73:19 76:10 79:16 81:7 82:2 83:2 88:2,14 92:7 95:4 96:17 forth 98:9 found 58:6 60:19 61:7 62:14 65:2 foundation 81:7 freak 64:21 89:3 free 7:10 friend 48:15 72:17 friend's 35:1	front 39:4 54:21 59:8,10 86:2 93:10 full 4:24 17:13,24 50:12 81:11 fulton 27:22 98:4 funny 8:9 further 47:6,11 49:19 61:18 98:12 g ga 3:22 78:15 gainesville 1:2 gap 83:15,16 general 5:7 generated 20:13 gentleman 52:7 georgia 1:1,18 2:4 2:11 3:11,12,14,16 3:20 6:24 7:3,8,16 7:24 10:8,25 11:3 13:16 15:23 21:19 25:13 26:23 27:7 34:16 77:7 78:20 98:2,7 getting 10:22 92:19 give 12:6 29:24 46:3 60:8,10 68:14 72:12 91:4 96:1 given 5:2,9 20:1 20:12 32:17 33:11 60:9 88:12 89:20 89:24 98:11 gives 20:25 glad 9:14 16:23 57:2 go 4:4 6:9 19:3,9 20:19 21:2,7,11 22:4,18 23:20 26:23 27:22 29:17	36:22 38:13 42:18 44:7 45:6,6,7 46:13 47:22 49:21 55:5 58:3 60:10 62:6 65:17 68:2 71:22 73:2,11 74:4 80:17 82:3 83:4,20 95:5 goal 25:16 goes 24:3 62:5 going 4:14 5:22 7:7,19 8:10 10:14 10:15 15:2,2,10,11 15:16 17:5,17 19:11 27:24 32:5 36:8,23 39:2,9,10 40:13,16,18 41:22 46:8 48:10,23 53:10,13,16,21 61:9 63:1 64:2,18 67:21 72:18 78:13 80:1 85:16 93:10 95:23 96:2 good 14:8 28:20 36:22 51:12,18 53:18 78:9 gotcha 28:2 29:22 31:4 33:8,10 54:13 71:17 72:14 gotten 6:24 21:2 gouge 47:17 65:16 65:17,22 69:3 82:22 83:6,10 84:23 85:5 gouges 83:20 grade 75:10 graduate 21:8 22:9 graduated 21:9,13 22:13
---	---	---	--

[grady - jparrish]

Page 7

grady 43:16 45:6 45:11 46:8 51:18 73:2,3,3,3,4 great 16:22 24:18 28:3,8 groceries 34:19 grocery 34:18 ground 66:24 guess 53:15 76:24 84:10 88:20 89:6 guy 56:20 86:6 guys 50:5	hear 41:1,2,23 42:7 43:3 heard 17:23 32:11 57:9 74:1 94:20 94:22 helicopter 45:4 57:9 73:11,12,13 help 7:12 16:3 67:21 helpful 8:5,19 hereinbefore 98:9 hereunto 98:16 hey 48:5 high 21:7,9,12,18 34:17,18 highlight 7:15 highlighted 7:20 hired 32:12,14 history 28:4 36:3 hits 82:5 hold 88:13 93:3 hope 12:6 hopefully 7:12 8:5 10:24 41:23 68:7 hospital 71:23 hospitals 51:12 hour 52:15 53:16 hours 70:14,14 house 42:14,17 housekeeping 17:3 huff 2:10 84:11 huffpowellbaile... 2:12,12 huh 10:11 16:21 18:4 20:24 21:16 25:9 31:11 37:24 45:15 48:13 50:9 62:17 66:1,16 68:12 70:9 84:25 hundred 30:3 72:12	i idea 14:12 35:2 38:4 identification 3:9 6:17 7:5,18 8:1 11:2 12:4 15:5,25 78:17 identify 54:4 55:9 ii 22:24 23:5,16 28:11 29:16 iii 22:24 23:15,16 imagine 6:21 impact 76:5 impacted 66:24 68:9 implied 26:20 improperly 9:19 9:23 inch 78:22 including 79:12 96:11 indentions 47:13 index 3:1 inflatable 60:2 information 45:5 45:9,10,25 46:2,5 46:9 51:18 73:4 95:10 initiated 69:4,6 injured 31:8,12 injuries 11:16 13:5,19,19 72:23 73:8 80:24 injury 48:20,21 71:10,13 72:5,25 instruction 23:4 intended 33:18 intention 66:17 intentionally 38:22	interested 98:14 interpreted 69:4 interview 96:11 intox 27:16 inventory 18:22 19:14 investigate 79:5 investigated 28:19 29:24 30:1 77:6 investigating 44:12,24 investigation 6:13 18:8 25:15 26:7 26:15 28:13 49:8 49:19 53:7 62:14 62:15,21 63:8,15 64:12 65:1 68:17 72:23 77:11,23 79:11 81:1 86:25 96:13 involved 36:2,5 76:22 involves 34:24 issue 46:12 iv 23:25 24:6
h ha 34:11 half 28:24 hand 7:7,20 12:8 61:9 63:1 78:13 98:17 handle 31:25 handled 17:7 handling 89:13 happen 64:22 94:6 happened 37:1,4 37:16 41:16 50:1 64:23 82:11 happening 42:24 happens 51:19 happy 5:15,18 45:18,22 haralson 13:22 21:9 37:17 39:22 40:11 hard 19:6 35:17 40:4 51:17,18 55:18 harmful 76:17,22 hate 19:16 77:2 head 5:24,24 72:1 72:4,4,5,6,25 headlight 54:19			j january 22:6 jeep 35:12,14,15 jeepfest 35:16,18 job 1:25 14:8 21:18 22:14 24:16 24:19 25:6,10 26:5 31:1 68:2,5 jobs 34:16 joey 1:12 3:3 4:2,9 98:8 joined 24:12 jonathan 2:2 joseph 5:1 jparrish 2:5

[jpeg - marked]

Page 8

jpeg 14:11 july 3:23 78:16 junk 19:17,23 54:12 79:23 jury 74:5	55:18,21 57:13,14 57:16,20,20 58:12 58:22 59:2,12,13 60:20 62:8,8,11,11 65:14 66:14 67:21 67:24 71:11,12,13 71:25 72:1,3,12,25 73:24 79:1,1,2 80:19 83:19 85:10 87:7,16,18,19 89:19 90:4,5,9 91:7,11,19,20,22 91:24 92:3,13,19 92:20	levels 23:15 24:8 license 46:9 life 13:23 46:5 48:23 lift 60:3,4 light 54:10 60:19 74:21 limited 33:15,20 line 82:14 lines 45:14 63:11 listed 7:21 listen 17:17 58:25 listened 42:2 little 2:17 6:12 14:1 17:2 25:5 38:14 40:13 41:2 41:5 47:6,11 55:15 60:4 61:18 68:20 82:20 live 37:21 llc 2:3,10 loaded 73:10 loads 20:8 locations 27:5,22 long 22:2,16 25:23 26:9 32:4 50:4 look 10:15 12:13 16:7,12 17:9 36:9 36:10 45:17,23,23 46:23 54:3 68:22 69:2 70:8,10 75:13 76:15 78:6 78:8,10 82:13 83:25 87:2,3 looked 7:13,14 16:23 55:15 60:22 63:7 76:18 78:2 83:24 84:9 looking 8:6 16:25 29:4 59:2 67:18 69:2 76:6 79:12	83:13,15 looks 16:13 19:17 19:22 37:10 54:23 55:12 56:3 60:16 60:21 78:12 lose 89:5 losing 93:22 lost 41:20 63:24 90:19 91:8,17 92:5,11,17 lot 7:11,12 25:13 37:25 38:10 58:9 70:13 88:25 90:6 loud 41:3 57:7 louder 57:9 love 14:10 luckily 42:17 44:7 44:7
k	knowledge 33:20 knows 67:22		
k 1:20 98:20 karissa 2:9 keep 17:5 27:19 78:4 kept 14:1 killed 48:7 kind 6:9 8:5,20 13:21 15:17 23:3 23:19 27:4,24 30:7 31:6,22 34:6 35:14,22 36:10 40:6 41:12 44:19 44:23,23 47:17 49:25 54:15 59:23 knew 54:24 86:1 know 5:14,18,25 6:11,13 7:10 8:7 8:15 9:12,12,16,21 12:10,25 13:1,2,9 13:10,24 14:2,2,4 14:11,15,20,21 16:24 18:24 19:14 20:4 28:9,14 29:3 29:5,23 30:7 33:14,19 34:4,11 35:25 36:2,5 37:7 38:25 40:1,17 41:15 42:13 43:6 43:15,17,19,21,24 45:3,17,20 46:25 47:4 48:11,22,23 49:1,23 50:10,25 51:1,25 52:6,22,24 53:2,19 54:11,22 54:24 55:1,2,2,14	laid 59:10,11,14 lane 9:23 10:1,4 11:18,20 63:16 78:4 91:16 96:15 lanes 9:19,23 law 2:3 25:11,19 26:8,15,15 28:6 84:11 laws 27:1 lawsuit 32:15 lawyer 32:14 laying 20:7 56:18 learned 43:18 leave 42:16 62:23 73:12 left 13:9 14:16,18 26:22 37:13 49:4 63:2,4,9,17 64:17 65:2 73:13 82:15 82:18,18 93:11 96:6 level 24:25 29:16 29:16 75:3,6,9	l	m
			machines 27:16,17 27:21,25 main 25:16 58:7 84:10 maintain 9:22,25 10:3 11:18,20 91:16 96:15 making 38:18 maneuver 92:4,11 92:23 manufacturer 34:13 mark 15:2,12 39:11 46:20 47:1 47:12,15 63:2 67:23 93:22 94:2 marked 6:17,18 7:4,18 8:1 11:2 12:4,21 15:5,24 18:14 48:11,17 62:1 67:17 70:24 77:9 78:14,16

[marking - october]

Page 9

marking 14:9 16:2 24:19 79:13 markings 12:10 81:2 82:15 83:9 83:10 marks 46:25 47:15 47:15,16,16,17 63:2,5 64:3,6 65:6 65:14,16,17,22,25 66:24 67:13,14 68:10 69:3 82:22 83:6,10 84:24 85:4,5 marriage 98:14 materials 6:10,20 matter 98:15 mboorman 2:12 mean 5:24 13:21 19:19 25:3 33:23 38:7 44:7 46:7 47:19 60:16 62:10 66:8 67:16,16 70:6 73:18,21 74:3 75:8 76:16 78:11 87:1,22 88:17,17 89:1 91:3,6,6,7 92:10 92:10,10,13,14 93:13 94:1 95:21 meaning 13:21 76:24 77:18 means 31:22 65:17 76:14,21 measure 86:17 measurements 18:13,19 48:18 medical 45:6,11 72:16 medication 41:13 medications 48:7	meeting 51:22 member 19:2 85:25 mentioned 84:16 mess 79:23 met 50:13,13 51:23 52:18 methodically 6:9 michael 2:8 mind 63:23 minute 15:11 16:12 46:24 minutes 37:21 40:22 42:23 45:14 45:16 52:14 80:4 80:6,8 96:2,6 missing 19:11 misstates 92:8 93:5 mistake 21:1 model 35:2 moment 17:9 month 44:17 49:9 49:10,21,24 51:22 months 44:15 motor 1:7 3:11,12 3:14 7:3,8,16,24 84:14 85:19 move 8:5 10:21 15:17 46:16 53:10 moved 26:12,13 26:17 70:15 movements 67:13 moving 36:19 mustang 35:12,20	narrative 9:25 93:4 near 59:23 80:17 nearly 73:22 necessary 88:23 89:9 90:14 need 5:12,13,13 7:9 17:6,7 36:19 44:6,8 49:3 53:16 59:17 67:21 81:8 needed 11:23 25:20 45:25 46:9 62:11 71:12,19,20 71:22,22,24 88:11 negative 34:1,10 never 24:12 29:21 34:20 61:4 73:9 74:1,1 78:24 94:10 new 47:19 night 47:25 nightmare 73:3 nineties 35:5 nodding 5:23 nods 6:3 noise 42:6 57:7 noncollision 76:20 nope 34:22 north 2:17 northeast 84:6 northern 1:1 northwest 26:17 27:7 notary 4:11 noted 87:1 notes 18:7,10 notice 6:19 16:2 54:11 notified 73:6 notify 51:14,15,20	notifying 51:12 november 21:14 98:17 number 11:22,23 29:5 30:23 69:19 82:17 numbers 11:22 12:9 53:22
			o
			object 32:2 63:13 65:8 67:1,15 73:19 76:10 79:16 81:6 82:2 83:2 88:14 92:7 95:4 96:17 objection 88:2,7 88:24 89:11 90:16 91:1 93:4 objections 4:13 obscured 77:17 observation 43:1 observations 36:12 72:23 observe 41:14 73:7 80:10 observed 33:5,6 45:21 81:2 obstructions 77:16 obviously 7:10 16:10 17:16 36:23 70:24 occasion 45:17 occupant 30:14 occupants 51:9 52:23 occurred 11:11 15:20 71:13 96:14 occurs 73:20 october 1:13 3:4 4:3 26:11

odor 58:25 59:1 office 84:8 officer 21:23 official 16:18,19 77:10 oh 17:1 29:6 30:2 60:3 66:13,19 70:5 76:4,6 78:1 84:23 87:25 okay 4:19 5:2,11 5:15,20,21 6:5,14 6:15 7:2 8:19 9:2 9:5,11,15 10:2,17 10:20 11:21 12:1 12:17 13:12 14:7 14:19,22 15:16,22 16:10,22 17:2,4,8 18:5,10 19:24 20:6,18 21:4,17 22:5,12,16,21 23:1 23:3,18,24 24:3,5 24:8,15,18,23 25:2 25:5,18,21 26:2,5 27:20,24 28:3 29:2,4,10,22 30:4 30:12,18,21 31:4,8 31:14,18 32:10 33:1,14,22,25 34:4 34:11,20,23 35:2,6 35:10,22 36:16,22 36:25 37:23 38:6 38:9,16,24 39:1,7 39:16 40:2,13 41:1,4,22,23 43:14 43:17,24 44:10 45:8,12 46:18 49:2,12,14,17 50:2 50:7,14,17 51:4,21 52:3,8,12,16 53:5 53:12,19,20 54:2 54:13,18 55:3,7,11	55:17,23 56:2,25 57:10,17,21 58:11 58:14,21 59:5,8,21 60:6,25 61:6,21,25 62:20,20 63:6 64:10 65:1,13,20 66:7,11 67:10 68:24 69:8,22 70:2,23 71:17 72:7,10,19 73:7,14 73:23 74:7,13,18 75:7,11 76:12,16 77:1,5,22 78:3,5 78:13 79:17,20 80:7 81:14 82:1,4 82:20 83:8,23 84:3,5,8,16 85:5 85:18,24 86:4,10 86:13,15 91:13 92:12,22 93:24 94:4,7,10,13,16,20 94:24 95:11,23 96:3,19 old 55:20 once 42:15 45:24 45:24 46:5,15 47:15,21 61:7 64:19 oncoming 63:16 ones 55:20 online 8:23,24 open 76:8 operator 21:24 opinion 33:11 70:19 83:9 opportunity 95:14 orange 83:10 order 22:20,22 53:14 70:6 original 3:24,24 8:25	ought 38:14 outcome 51:19 73:24 98:15 overcorrect 63:21 64:19,21 89:4,4 91:17 92:16 overcorrected 41:20 63:9,24 64:14,17 91:9,10 92:16,18 94:2,9,18 94:23 96:16 overcorrecting 92:25 94:1,14 overcorrection 63:17 65:2,3 87:21 88:1 overlay 3:13,15 7:17,25 oversteer 94:8 oversteered 93:18 oversteering 81:23 81:24 93:1,12,21 93:25 94:11,21 overturn 66:9,9 overturned 85:3 91:15 overturning 83:22 overwhelm 8:4	parameters 34:6 paren 76:8,9 parentheses 47:18 parrish 2:2,3 3:7 4:13,19 5:19 32:2 49:11,13,22 50:2 63:13 65:8 67:1,4 67:15 73:19 76:10 79:16,25 81:12,23 82:5 83:8 88:4,8 88:20 89:6,12 90:21 92:12 93:7 93:15 95:7,12 96:17,22 parrishfirm.com 2:5 part 24:12,16 36:17 44:15 45:18 49:13 56:10 57:14 62:14 63:14 64:12 65:1 68:15,16 72:3 parties 98:13 parts 66:23 68:9 80:11 party 10:14 passenger 30:7,14 32:1 39:4 54:18 57:25 59:9,11,22 82:6,8 patch 87:8,13 path 70:25 patrol 6:25 10:8 13:17 21:14,19 26:24 34:16 68:21 73:13 paulding 14:14,16 14:18 26:13,22 27:8 28:25 paulding's 14:17
--	---	--	--

[paved - quick]

Page 11

<p>paved 49:15,25</p> <p>pavement 84:19 87:5,9,12,14</p> <p>pay 22:20,22 46:13 74:2,3 79:4</p> <p>peachtree 1:15,16 2:10 84:6</p> <p>pedestals 55:13</p> <p>people 5:23 20:2 27:21 30:23 38:13 47:3 50:10 56:22 58:9 89:1,2</p> <p>percent 72:12</p> <p>perfect 40:6 96:6</p> <p>period 13:15</p> <p>person 18:3 43:19 43:21 51:13 59:17 88:15</p> <p>personally 73:7 80:10</p> <p>phone 2:15 13:2 14:5 48:5</p> <p>photo 45:22,23 54:3 55:5 60:9,18 62:2 63:1,7,16 64:2,4 65:6 68:13 78:8,9 82:13</p> <p>photographic 85:22</p> <p>photographing 14:9,9 24:19</p> <p>photographs 3:18 12:4</p> <p>photos 12:14,14 12:18,20 13:15 14:21 18:16 20:14 36:9 46:23 50:15 50:17 53:13,24 83:25</p> <p>physical 19:25</p>	<p>pick 56:20,23 58:22</p> <p>picked 86:25</p> <p>pickup 31:16</p> <p>picture 61:14 86:5 86:9</p> <p>pictures 13:4,11 14:10 19:16</p> <p>piece 56:11</p> <p>pieces 74:15</p> <p>pillar 56:6,11,14 57:4,11,12,25</p> <p>pillars 80:11</p> <p>pillow 60:16</p> <p>pinned 43:7</p> <p>plaintiff 1:5 2:2</p> <p>play 41:22 43:9 45:18</p> <p>played 40:20 41:25 86:20,23 95:1,2</p> <p>plaza 2:3</p> <p>please 4:7 37:9 81:9</p> <p>point 5:12 7:10 25:10 40:23 43:18 53:24 55:10 59:16 62:23 63:6 66:3 66:25 67:14 68:13 68:15,16 84:17 89:8</p> <p>pointing 71:15</p> <p>police 20:1 37:8</p> <p>policy 13:6</p> <p>pollard 7:22 11:12 38:19 39:2 40:17 40:24 41:6 42:7 43:1,19,25 50:11 52:23 62:2 63:9 63:19 64:14 71:8 73:25 77:14 79:12</p>	<p>88:9,9 96:11,14</p> <p>port 72:4</p> <p>portion 56:14</p> <p>poseyville 37:17</p> <p>position 22:14,17 59:16</p> <p>positive 34:1,10</p> <p>possible 46:7</p> <p>possibly 41:15</p> <p>post 13:1 14:14 20:23 22:15 25:8 25:12 26:18,21 44:16</p> <p>powell 2:10 84:11</p> <p>practice 46:22</p> <p>precise 29:5</p> <p>precision 85:11</p> <p>preference 95:20</p> <p>present 11:12</p> <p>pretty 5:19 25:15 37:19 38:3,12 42:12 51:12 61:19 71:18 73:21 90:5</p> <p>previous 8:17 60:18</p> <p>previously 5:4 13:4 58:1</p> <p>primary 31:22</p> <p>print 10:14</p> <p>printed 10:22</p> <p>prior 24:9 36:6,14 92:8 93:5</p> <p>probably 6:21 7:11,11 25:12 28:22,25 30:2 31:15 35:24 42:19 48:9 50:22 52:1,9 86:24</p> <p>procedural 44:23</p> <p>process 13:14 44:23</p>	<p>product 33:12</p> <p>proper 78:4</p> <p>properly 27:19</p> <p>property 11:16</p> <p>prosecutable 13:19 48:6</p> <p>prosecute 48:11</p> <p>protocol 44:11</p> <p>provide 14:4</p> <p>provided 43:24</p> <p>public 4:11</p> <p>pull 57:1 90:10,11</p> <p>pulled 15:14 57:19</p> <p>purchase 16:6</p> <p>purpose 15:6</p> <p>pursuant 4:6</p> <p>push 10:19</p> <p>put 9:20,24 12:2 12:10 20:2 25:1 34:6 42:18 44:18 47:18,23 50:1 53:14 59:24 60:3 67:25 68:1,19 69:23,24 75:5,8 94:10,19</p>
q			
<p>qualified 33:3</p> <p>quality 14:10</p> <p>quarter 81:4,12</p> <p>question 4:14 17:16 28:17 65:12 66:20 68:7 87:16 88:18,21 91:2 92:14 93:4 95:8</p> <p>questions 5:17 8:10 14:8 15:17 36:9 41:4 49:3 52:14 66:21 79:22 80:1</p> <p>quick 36:11 42:12 60:10</p>			

[quickly - roll]

Page 12

quickly 21:3 36:19 53:11 quite 79:23	reconstruct 23:18 24:15,20 66:15,22 69:8	76:7 77:3 80:3 87:2 94:10 reporter 6:2 95:18 98:6	46:22 47:24 52:10 52:18,21 54:20 56:10 59:22 60:8 61:9,11,17,22 62:1 62:5,18,25 63:19 64:15,24 65:3,5 67:19 68:5,23 69:3,5 70:18 71:6 71:16 75:2,21 76:9 77:13,25 79:1,10 80:9,19 82:10,12,24 83:14 83:23 85:5 91:15 91:19 93:9,10,15 93:18 95:7,11 96:1,4,10,19,23,23
r	reconstructed 29:10,12	reports 8:17 18:23 94:3,17	rims 65:18 83:6
r 2:8 98:1 radio 21:23 51:15 rained 74:16 raining 74:15 raises 22:20,22,25 23:23 ran 41:18 47:6,11 64:16 78:2 91:9 92:15 randy 40:9 ranks 22:19 rate 69:13,15 read 16:17 95:15 ready 4:4 8:7 real 36:11 60:10 realize 83:15 really 6:3 8:19,19 13:18 14:8 25:3 38:1 41:3 44:8 45:2 50:25 51:15 55:19 60:21,23,23 67:23,24 73:9 75:8,9 88:18 rear 78:9 reason 5:13 14:7 49:6 61:25 88:8 88:10,21 recall 14:24 15:13 23:7 40:18 41:6 43:10 50:18 55:24 60:21 recess 96:7 recognize 10:24 11:5 39:17 60:13 recon 22:24,24,24 23:25	reconstruction 23:15 24:5 67:9 68:2 reconstructions 24:11 record 4:4,25 81:8 98:10 recorded 51:1 red 59:25 reference 7:9 refused 72:16 regardless 90:18 90:19 91:9 regularly 27:25 reissued 14:20 relate 28:13 related 6:20 7:13 12:18 20:14 51:24 53:7 77:14 98:12 remember 5:12 14:6 39:23 50:7 50:12,22 52:5,6 54:10 60:20,21 71:13,19 repair 34:21 36:3 rephrase 5:18 67:2,4 report 3:11,12,14 3:21 7:4,9,14,17 7:25 8:15,21,22,23 8:24,25 9:7 10:13 13:8 15:24 16:5 16:11,15 17:13 20:23 37:9 39:3 46:11,12 68:19 69:24 71:15 76:3	represent 7:7 representatives 85:20 86:10 representing 52:1 requested 20:22 74:5 requests 6:22 reserve 4:13 respect 77:13,15 responsibilities 26:6 responsiveness 4:15 rest 53:24 59:16 66:10,25 67:14 68:14 74:16 82:8 result 31:8 96:10 resurgens 2:3 retain 19:25 retained 20:4 return 49:5 rica 22:15 25:8,12 25:16,24,25 28:23 28:23 ride 44:17 right 5:22 6:7 10:18 11:8 12:8 15:1 16:1 18:7 19:5,8,13,18,21 20:20 21:11 24:3 27:1 28:16,17,18 32:18 33:22 34:15 35:24 36:17,18 37:4,15 39:14,20 42:1,4,10,17 45:13	road 2:4 37:17,19 38:2,13 41:18,20 42:8 46:17,20 47:6,22 49:15,25 59:6 61:11,23 62:1,16,23 63:8 64:16,19 65:19 68:9,10 73:15,16 74:12,19,19 75:2 75:10,18 84:20 85:13 89:2 90:8 91:10,14 92:15 93:19 roadway 47:13,14 61:12 62:22 74:24 77:19 78:2 81:3,3 83:7 robin 1:20 98:6,20 rock 2:17 rode 47:3 role 22:2 86:20,23 95:2,2 roll 30:7,12 66:4 69:15 83:12,14,17

[rolled - sir]

Page 13

rolled 70:20	67:23 70:11 72:15	seen 17:21 20:13	45:22 53:9,15,21
rolling 44:25 45:2	79:13,13 80:5,17	30:6,10 47:10	64:2 77:4
84:21 85:8	96:12	58:19 59:3,14	showed 40:10,11
rollover 30:13,15	school 9:1 21:7,9	73:10,11,12 85:17	side 10:19 12:2
65:3 73:15,20	21:12,18 22:4,6,10	90:8	54:18 56:6,11
76:21,23 95:2	22:13 23:10 34:17	segments 42:14	57:4,11,12,25
96:14	34:18 44:16 55:20	seized 8:9	59:23 61:12,22
rollovers 29:25	schooling 21:11	seminars 32:6	63:3,3,4,10 64:6
68:25	scrapes 83:7	sense 25:6	78:9 79:2 81:15
rolls 69:20 70:7	scratches 70:8,11	sensor 33:24 34:9	81:17,18,19 82:5,6
rome 26:12 27:8	screen 15:8	sent 6:22 44:16	82:8,15,16,18,19
ronnie 3:15 7:25	scrt 23:22 24:2,12	86:6	91:14 93:19
39:4	48:1,2,5,15,19	separate 17:18	sideways 56:19
roof 81:16 82:6	67:8 85:21,24	sequence 76:20	sign 11:14 95:15
room 51:15	86:6 90:6,11	91:20 92:1	signature 11:5
rotation 64:9,14	searched 8:11	sergeant 39:24	16:8 17:10 95:18
93:13,14,20	seat 43:6,7 59:9,11	40:9	95:24 98:19
round 55:20	59:12	serious 13:5,18,24	similar 52:14
rpr 1:20 98:20	seated 59:8	38:3,12 47:4	94:17
rubber 87:14	second 15:11,12	48:20,21	simple 68:4
rude 5:25	16:7 39:9 50:3	service 36:3	simply 91:13
rule 74:24	88:13 93:3	set 98:9,16	single 19:6
ruled 75:14,18	seconds 40:22	seven 47:3	singleton 2:15
rules 4:7,18	section 10:4 76:7	severe 73:17,22	sir 5:5 7:10 11:5,7
run 18:17 27:18	78:18,21 79:8	sewn 71:12	12:1,16,19,22
41:20 46:2 47:6	security 26:23	shaken 43:2,4	14:25 15:15,21
64:19 89:1	27:9	shakes 6:4	16:8,9 17:12,14
running 28:1	sedans 30:7	shaking 5:24	18:6,12,14,18,21
s	see 6:1 12:7 15:13	sheet 7:15,20	21:20 23:6 24:4
s 31:7	16:2 17:22 18:10	sheets 8:7,11	24:10,14,17,22
saw 17:10	18:16,19,23,24	18:22	27:3,11 28:5,7,15
saying 33:17 38:10	23:16 28:24 39:11	shoot 64:21	30:16,17,19,20
38:11 68:6 92:25	40:18 44:17,19	shoots 64:20	31:21 32:9,16,19
says 47:5 76:8,11	51:6 54:18 55:19	shop 34:21	32:21 33:13 34:14
78:21	56:11 58:20 59:22	short 66:11	34:22 35:1 36:4,7
scene 12:15 14:9	60:11,22 61:10	shortcut 66:21	36:15,21 37:3,6,12
15:14,19 18:2,11	63:16 66:8 68:11	shortly 12:15	37:14,18,21 38:15
18:13,14,20 23:5,5	70:25 74:14 75:4	15:20 42:11	39:6,19 40:25
24:20 28:10 39:20	76:3,7 77:21 79:2	shot 15:9 32:4	42:5,9,12 43:20,23
45:22 49:4,5,22	seeing 59:5	show 10:23 15:10	44:1,14 46:21
50:3 59:3 67:17		15:11 39:10 40:13	50:9,16 51:7,11

[sir - talented]

Page 14

52:20 53:1,4,8 54:1,21 56:1,5,7,9 57:5 58:19 59:18 59:20 61:3,13,15 61:24 62:19,24 63:12,18 64:5 65:4 69:10,12,14 69:16,18,21 70:9 70:12,17,22 71:2,5 72:16 73:9 74:20 74:23 75:17,20 77:8,12 79:9,15 80:6,15,21,25 81:13 82:9,23 83:1,11 84:2,13,15 85:7,9,14,23 86:12 86:14,18,21 87:6 87:22 89:10,15,18 89:21,25 90:3 92:21 94:12,12,15 95:3,6,14 sit 24:24 80:13 sitting 67:18 situation 90:13,23 92:4,5,23,24 skid 47:15,16 skills 89:1 skip 70:23 slide 56:23 58:23 slides 93:8 sliding 65:18,21 83:22 84:22 85:3 93:11 slot 72:4 slung 18:25 smell 41:13 58:25 61:4 sole 79:14 somebody 40:15 57:12 70:18	somers 2:16 somewhat 62:4,7 sooner 21:2 sorry 76:6 78:6 81:6 93:3 sort 10:9 66:17 95:17 sounds 10:9 31:15 59:16 67:24 space 83:21 85:1 speak 44:8 85:21 85:24 special 22:23 72:4 specific 15:17 36:1 36:9 55:9 66:23 67:12 specifically 7:22 70:15 spectacular 47:20 speculation 83:3 88:14 90:16 speed 69:11 85:10 85:11,15 speeding 41:19,19 85:12 spelling 95:16 spend 36:23 66:14 spoke 84:17 85:19 spoken 32:6 spot 50:1 ss 98:3 standing 56:12 58:24 stands 54:8 start 39:9 40:19 47:5 63:5 71:8 91:25 started 21:13 46:16 47:10,12 61:19 74:15 83:12	starting 26:2 47:19 64:8 starts 42:3 64:13 64:22 83:17 state 3:20 4:24 6:24 10:8 13:16 14:3 15:23 21:14 21:19 25:13 26:24 34:16 77:7 81:8 98:2,7 statement 45:24 statements 17:15 17:19 18:1 42:10 50:19 58:25 states 1:1 94:19 stay 42:14 44:3 58:4,16 stayed 25:25 26:11 stitched 71:24 stitches 71:19 stood 55:3 stop 25:17 39:12 47:16 65:6,14,17 stopped 40:21 stopping 39:14 store 34:19 straight 47:17 75:3,4,6,9 straightaway 62:5 62:7 street 1:16 2:10 84:6 stuff 10:19 14:17 17:5,6,7 18:25 19:4 48:16 54:14 54:15 57:6 60:17 67:22 68:21 subjective 88:4 subpoena 3:10 6:16 74:2,3,4,6	suburban 31:24 sue 19:12 suggest 86:13,19 suite 1:17 2:3,10 2:17 summons 3:17 11:1 sun 77:19 sure 4:21 5:19 15:18 19:24 20:11 27:18,25 32:11 35:25 37:8 38:18 46:3 49:7 50:24 65:10 67:3 68:25 70:3 76:16 84:21 surface 74:19 surprising 30:21 30:23 suvs 30:7 31:20,25 swear 4:8 switch 72:21 sworn 4:10 98:9
			t
			t 98:1,1 tables 55:16,19 take 5:15 6:3 8:6 10:15 12:20 13:4 13:14,15 16:3,12 17:15,18 18:7,13 20:2 22:23 23:14 23:23 26:21 35:16 45:17 46:2 50:15 50:17,19 53:13 54:3 56:16 70:7 70:10 72:18 75:13 78:6 96:2 taken 4:6 21:1 41:12 72:15 96:7 takes 70:13 talented 6:2

[talk - troop]

Page 15

talk 6:9,11,12 15:12 18:2 36:24 44:7 49:11 59:17 talked 17:20 28:10 50:20 52:13 57:11 63:20 talking 18:3 32:24 34:3 43:10 53:22 54:6 59:25 60:1,2 64:3 69:25 70:1 71:22 79:12 tape 18:17 taught 47:2 teach 23:21 team 23:22 24:2 24:13 29:18 48:1 48:2,15 67:8 85:21,25 90:11 teams 90:6 tell 6:8 9:18 10:7 10:18 11:4,8 15:1 16:5,12 19:1,2,9 27:15 46:22 50:5 52:9,10 54:3 55:8 60:23 65:24 80:12 telling 50:23 83:5 tells 90:5 ten 30:1,2 35:8 80:6 term 88:4 93:24 94:7 terms 70:25 71:9 77:22 91:19 92:1 terrible 51:19 67:24 territory 26:11 test 27:17,18 testified 4:11 32:20,22 testify 3:10 6:17 34:8	testimony 33:15 34:7 92:8 93:5 98:11 tfc 22:19 23:2 25:3 25:3 thank 6:7 10:5 12:1 62:12 79:17 theirs 19:19 55:22 thing 5:16 7:6 8:3 10:23 12:5 19:7 20:17 21:6 26:7 26:14 27:5 34:2 42:18 45:19 49:1 50:23 66:17 things 5:11 17:17 20:3 36:24 41:17 42:13 46:25 53:9 60:12 62:3,9,16 63:22 71:7 95:17 96:15 think 4:18 8:4 9:24 16:5 18:25 25:12 28:9,9 29:12,15 31:25 39:24 40:16,16 41:15 43:15 45:12 66:11 68:19 70:2 71:23 72:17,24 73:11 81:3 82:21 83:21 84:16 95:12 96:5 thinking 41:17 42:7 62:2,15 91:23 96:14 third 10:13 36:17 thought 55:3 88:11,23 89:9 90:14,24 three 22:3 40:3 44:15 50:5 69:24 69:25 78:2 81:4	81:10,11 throws 20:8 thumb 15:8 ticket 11:11 43:13 71:21 85:13 time 7:23 8:6,18 8:20 11:13 13:15 16:13,16 18:20 21:3 25:11 35:19 36:23 38:8 39:12 44:13,13 45:5 50:15 55:25 57:3 60:14 66:15 74:9 74:10,18 77:23 78:1 79:18 80:4 81:2,4 86:16 87:5 87:6 88:12,23 89:20,24 91:23 timeline 28:4 times 32:22,25 35:8 64:20 69:24 69:25 70:19 73:16 timing 96:5 tips 66:3 tire 20:3 63:2 64:3 64:6 65:6,14,25 66:24 67:13,14 68:10 78:9,10 79:2,3,7 86:2,2 87:7,10 tires 47:24 61:22 63:3,5,7,10 78:11 78:21 82:15,16 83:6,19,20 86:1,3 86:7,20,22,23 87:2 87:3 title 21:21 24:24 today 24:24 48:6 66:18 80:14 told 13:3 19:15 41:6,6,7 42:4	43:15 62:9,15 63:19,22,23 71:21 71:23 72:24 80:15 81:3 85:15 top 56:17 76:5 torso 72:9 touch 11:24 touched 68:15,16 71:1 tough 41:2 traction 87:9,10 87:17 traffic 3:16,20 11:1,4,10,15 15:24 25:11,19 26:8,15 26:15 27:1 63:16 trained 44:5 94:25 training 23:5 24:12 29:13 32:7 transcript 3:25 15:7 transferred 26:4 transportation 31:23 travel 63:15 70:25 traveling 41:10 85:12 tread 78:10,22 86:17,19 87:8,11 87:12 treads 20:3 treatment 43:24 72:15,16 trees 77:20 trial 32:20,22 33:4 33:24 74:5 trick 17:16 tried 10:9 20:11 20:21 46:6 92:15 troop 27:13,14 48:3,3
--	---	---	---

[trooper - walk]

Page 16

trooper 1:12 3:3 4:2,5,9,24 9:1 22:4,6,9,13,15,18 23:9 24:25 25:4,8 26:19,25 44:14,16 47:2 79:18 98:8 troopers 23:5 truck 35:13,22 trucks 31:16 41:3 57:8 true 5:19 63:21 75:19 77:9 89:13 89:17 92:6,10 96:16 98:10 truly 85:2 trust 95:18 try 14:12,14 38:22 39:2 44:6,18 45:4 46:16,24 51:18 56:19 58:4 59:15 66:18 68:22 73:4 79:22 trying 16:18 17:16 19:11 37:7 39:24 44:3 45:9 46:8 47:9 56:19,22 58:22,25 59:3 60:4 62:13 70:2 90:23 tturner.com 2:18 tuesday 1:13 3:4 4:3 turn 13:16,20 64:8 70:1,1,1 81:15,16 81:17 93:8,9 turned 14:2,15,16 69:23 88:11,22 89:8,20,23 90:13 90:20,24 91:20 92:2,2,20	turner 2:16 turning 81:22 90:22 92:4,23 turns 81:5,12,15 83:7,18 93:1 twice 96:16 two 5:10 11:22 20:19 28:23 32:17 40:22 49:10,24 50:4 51:23 67:20 78:4 81:15 82:13 82:14 83:10 84:18 84:18 86:1,7 96:1 type 55:19 types 30:6,10 typo 8:13 typographical 95:16	undertake 70:21 71:3 uniform 3:16 10:25 11:4 42:18 42:19 united 1:1 update 8:16 9:4 updated 8:16 27:19 upgrade 10:9 upper 71:14,14,18 72:3,8 upright 81:14 ups 79:19 upset 43:10 use 13:2 16:18,22 33:17 39:2 44:12 44:24 47:14 54:16 68:21 81:20 94:7 94:8,8,13,18 usually 11:17 13:4 18:25 19:1,2 38:2 38:12 44:1 47:15 47:18 51:11,19,20 58:1 64:22 65:18 67:22 72:8 83:5 83:16 94:5	67:12 68:9,14 69:7 70:8,15,19 73:16 75:23,25 76:2,9,22,24 80:11 80:11 81:14,23 82:25 83:12,18 84:22 89:5,16 91:15 92:6,11,11 93:1,9,14,18,23 95:1 vehicle's 93:8 vehicles 12:15 30:6,12 35:10 46:16 64:20 67:20 67:21 89:12 90:4 version 10:13 versions 8:11 versus 80:13 vicinity 13:21 video 3:19 14:24 15:3,5,9,18,18 17:18 18:3 39:8,9 39:14 40:14,20 41:8,25 45:12,13 45:23 51:2 71:20 73:12 videos 20:14 villa 22:15 25:8,12 25:16,24,25 28:23 28:23 violation 79:8 visibly 43:2 vision 77:15,17 visit 50:3 voice 43:3 vs 1:6
	u		
	uh 10:11 16:21 18:4 20:24 21:16 25:9 31:11 37:24 45:15 48:13 50:9 62:17 66:1,16 68:12 70:9 84:25 understand 5:17 23:3 31:16 35:24 45:16 62:13 understanding 29:4 understeering 94:21 understood 17:25 20:10 23:13 28:2 29:19 42:21 44:10 44:21 46:14,18 48:13,24 49:20 51:21 57:24 58:8 62:20 64:1 68:6 79:6 90:21	v	
		v 23:25 24:3,6,9 28:12 vague 88:3 90:17 validation 86:5 valuable 19:3,10 various 8:11 27:5 vehicle 3:11,12,14 7:4,8,17,21,25 18:22 19:10 20:3 31:6,12,19 44:3 47:8 54:6,9 58:17 60:4,14 61:17 64:8,13 65:21	wait 38:18,18,18 waive 95:17,24 walk 8:20 40:15 45:21 58:17

[walked - z71]

Page 17

<p>walked 52:10 59:6 want 5:11 6:9 15:7 15:13,18 20:21 25:1,5 35:25 39:8 39:13 40:5,15,18 43:15 44:4 47:5 53:9,14 57:10 59:15 66:12 87:18 91:8 92:14 wanted 4:19 24:1 34:4 wants 90:12 warranted 85:12 watched 41:7 71:20 water 5:14 way 6:8 13:21 17:6 28:12 33:16 35:19 41:8 44:4 44:19 46:15 57:14 58:10,15 68:2,13 80:17,23 89:22 92:2 98:14 we've 6:1,21 8:2 8:11 17:6 28:10 29:15 32:12 40:5 53:16 57:10 64:3 77:9 weather 74:8 week 84:1 85:20 went 9:6 22:6 42:8 49:14,24 50:13 61:11,17,25 62:16 69:5 91:14 92:16 wheel 88:11,22 89:8,19,23 90:13 90:20 91:21 92:2 92:3,21 wheels 82:25 84:18 93:10,11</p>	<p>whereof 98:16 white 52:7 wider 64:7 wilson 1:12 3:3 4:2,5,9,24 5:1 98:8 windshield 57:13 wingo 18:24 wingo's 19:12 witness 4:8,10 17:22,24 49:12 79:20 82:4 95:21 95:25 96:3 98:8 98:11,16 wondering 43:18 wood 55:13 word 6:2 words 93:9 work 11:15 26:23 28:4,22 34:20 42:14 44:18 47:20 70:13 96:10 worked 9:21 25:13 26:12 33:6 34:12 34:18 47:4 working 26:25 27:12,19 34:15 44:2,20 50:11 58:2,4 67:11 wow 21:17 wrangler 35:15 wrapping 54:23 wreck 9:21 11:10 11:25 38:8 42:16 48:2,6 49:19 64:22 68:3,3,4 80:5,23 93:17 94:18 wrecker 20:8 wrecks 25:14 38:11,12,12 47:20</p>	<p>94:5 wrist 31:9 write 11:17,19 19:6 50:8,9,21 85:17 94:3 writing 43:12 written 17:18 44:11,22 95:19 wrote 11:11,13 78:24 87:4</p> <p>y</p> <p>y'all 85:15 yaw 47:15,16 63:5 69:13,17 93:22 94:2 yawing 65:17 yeah 16:15 17:1 22:1 27:8 29:6 30:5,22,25 31:5,24 33:2 34:4,8 40:8 49:24 54:8,14 55:20 56:16,21 60:7,17 61:16 62:4,10 63:4 64:16 66:13,19 67:5 72:20 75:12 76:13 80:8 81:21 81:22 82:17 83:5 84:21 85:1 87:13 91:22 93:16 95:9 95:9 year 21:8 26:22 28:23 35:2,20 years 22:3 28:24 40:4 yellow 63:11 yep 81:25 young 35:7</p>	<p>z</p> <p>z71 35:23</p>
--	--	---	---

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.